Pest Management Regulatory Agency
Agence de réglementation de la lutte antiparasitaire

Regulatory Note

REG2001-12

Florasulam
EF-1343 Suspension Concentrate Herbicide

The active ingredient florasulam and associated end-use product EF-1343 Suspension Concentrate Herbicide for the control of broadleaf weeds in spring wheat, including durum, spring barley and oats (tankmix only) have been granted temporary registration under Section 17 of the Pest Control Products Regulations.

This regulatory note provides a summary of data reviewed and the rationale for the regulatory decision for these products.

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Foreword

Health Canada's Pest Management Regulatory Agency (PMRA) has issued a temporary registration for Florasulam Technical, a herbicide developed by Dow AgroSciences Canada, Inc., and the associated manufacturing use products, EF-1440 Manufacturing Concentrate and EF-1343 Manufacturing Concentrate, and the end-use product, EF-1343 Suspension Concentrate Herbicide, for broadleaf weed control in spring wheat, including durum, spring barley and oats (when applied in a tank mixture only).

Methods for analysing florasulam in environmental media are available to research and monitoring agencies upon request to the PMRA.

Dow AgroSciences Canada Inc. will be carrying out additional crop residue studies as a condition of this temporary registration, along with batch data analysis of the technical florasulam. Following the review of this information, the PMRA will publish a proposed regulatory decision document and request comments from interested parties before proceeding with a final regulatory decision.

Table of Contents

1.0 The active substance, its properties and uses 1
1.1 Identity of the active substance and impurities 1
1.2 Physical and chemical properties of active substances and end-use products ... 2
1.3 Details of uses 4

2.0 Methods of analysis 5
2.1 Methods for analysis of the active substance as manufactured 5
2.2 Method for formulation analysis 5
2.3 Methods for residue analysis 5
2.4 Methods for environmental residue analysis 6

3.0 Impact on human and animal health 7
3.1 Integrated toxicological summary 7
3.2 Determination of acceptable daily intake 11
3.3 Acute reference dose 11
3.4 Toxicological end point selection: occupational and bystander risk assessment 11
3.5 Impact on human and animal health arising from exposure to the active substance or to its impurities 13
3.5.1 Operator exposure assessment 13
3.5.2 Bystanders 15
3.5.3 Post-application exposure 15

4.0 Residues 15
4.1 Residue summary 15

5.0 Fate and behaviour in the environment 16
5.1 Physical and chemical properties relevant to the environment 16
5.2 Abiotic transformation 17
5.3 Biotransformation 17
5.4 Mobility 18
5.5 Dissipation and accumulation under field conditions 18
5.6 Bioaccumulation 19
5.7 Summary of fate and behaviour in the terrestrial environment 19
5.8 Summary of fate and behaviour in the aquatic environment 19
5.9 Expected environmental concentrations 20
5.9.1 Soil 20
5.9.2 Aquatic systems 20
5.9.3 Vegetation and other food sources 20
5.9.4 Monitoring data 20

6.0 Effects on non-target species 21
6.1 Effects on terrestrial organisms 21
6.2 Effects on aquatic organisms 21
6.3 Effects on biological methods of sewage treatment 21
6.4 Risk characterization 21
6.4.1 Environmental behaviour 21
6.4.2 Terrestrial organisms 22
6.4.3 Aquatic organisms 23
6.4.4 Incident reports and additional considerations 23
6.5 Risk mitigation 23

7.0 Efficacy 25
7.1 Effectiveness 25
7.1.1 Intended uses 25
7.1.2 Mode of action 25
7.1.3 Crops 25
7.1.4 Effectiveness against pests 26
7.1.5 Total spray volume 35
7.2 Phytotoxicity to target plants (including different cultivars), or to target plant products 35
7.2.1 EF-1343 at 5 g a.i./ha + Agral 90 at 0.2% v/v 35
7.2.2 EF-1343 at 5 g a.i./ha + MCPA ester at 420 g a.i./ha 36
7.2.3 EF-1343 at 5 g a.i./ha + Curtail M at 495 g a.i./ha 37
7.2.4 EF-1343 + MCPA ester + Assert 300 SC 38
7.2.5 EF-1343 + MCPA ester + Horizon 39
7.2.6 EF-1343 + MCPA ester + Puma Super 39
7.2.7 EF-1343 + Curtail M + Assert 300 SC 40
7.2.8 EF-1343 + Curtail M + Horizon 40
7.2.9 EF-1343 + Curtail M + Puma Super 41
7.3 Observations on undesirable or unintended side effects, e.g., on beneficial and other non-target organisms, on succeeding crops, other plants or parts of treated plants used for propagating purposes (e.g., seed, cutting, runners) 42
7.3.1 Impact on succeeding crops 42
7.3.2 Impact on adjacent crops 42
7.4 Economics 43
7.5 Sustainability 43
7.5.1 Survey of alternatives 43
7.5.2 Contribution to risk reduction 43
7.5.3 Information on the occurrence or possible occurrence of the development of resistance 43
7.6 Conclusions 44

8.0 Toxic Substances Management Policy considerations 44
8.1 Active ingredient 44
8.2 Transformation products 45
8.3 Formulants 45
8.4 By-products or microcontaminants 45

9.0 Regulatory decision with additional data requirements 45

List of abbreviations 47

References 49

Appendix I Toxicology summary tables 51
Summary of toxicity studies with florasulam 51

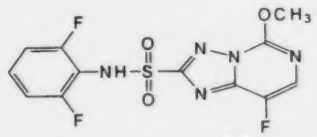
Appendix II Residues 61

Appendix III Environmental assessment 69
Table 1 Maximum EEC in vegetation and insects after a direct overspray 69
Table 2 Physical and chemical properties of florasulam relevant to the environment 70
Table 3 Physical and chemical properties of 5-hydroxy-XDE-570 relevant to the environment 70
Table 4 Fate and behaviour in the terrestrial environment 71
Table 5 Summary of transformation products formed in terrestrial fate studies 72
Table 6 Fate and behaviour in the aquatic environment 73
Table 7 Summary of transformation products formed in aquatic fate studies .. 74
Table 8 Effects on terrestrial organisms 75
Table 9 Effects on aquatic organisms 77
Table 10 Risk to terrestrial organisms 79
Table 11 Risk to aquatic organisms 80

Appendix IV Value 81
Table 1 Proposed herbicide tankmixes with EF-1343 Suspension Concentrate Herbicide, plus surfactant in spring wheat, durum wheat, spring barley and oats 81
Table 2 Proposed non-ionic surfactant tankmix with EF-1343 Suspension Concentrate Herbicide and tankmix partners 81
Table 3 Alternative post-emergent herbicides for broadleaf weed control in cereals 82
Table 4 Summary of label proposals and recommendations based on value review 83

1.0 The active substance, its properties and uses

1.1 Identity of the active substance and impurities

Active substance		Florasulam
Function		Herbicide
Chemical name		
1.	International Union of Pure and Applied Chemistry	2′,6′,8-trifluoro-5-methoxy-*s*-triazolo[1,5-*c*]pyrimidine-2-sulphonanilide
2.	Chemical Abstracts Service (CAS)	*N*-(2,6-difluorophenyl)-8-fluoro-5-methoxy[1,2,4]triazolo[1,5-*c*]pyrimidine-2-sulfonamide
CAS number		145701-23-1
Molecular formula		$C_{12}H_8O_3N_5F_3S$
Molecular weight		359.3
Structural formula		
Nominal purity of active		99.2% nominal (limits: 96.2–100%)
Identity of relevant impurities of toxicological, environmental or other significance		Based on the raw materials, the manufacturing process used and the chemical structures of the active and impurities, the technical substance is not expected to contain any toxic microcontaminants as identified in Section 2.13.4 of Regulatory Directive DIR98-04, *Chemistry Requirements for the Registration of a Technical Grade of Active Ingredient or an Integrated System Product*, or any Toxic Substances Management Policy (TSMP) Track-1 substances as identified in Appendix II of DIR99-03, *The Pest Management Regulatory Agency's Strategy for Implementing the Toxic Substances Management Policy*.

1.2 Physical and chemical properties of active substances and end-use products

Technical product

Property	Result	Comment
Colour and physical state	Off-white	
Odour	Odourless	
Melting point or range	193.5–230.5 °C	
Boiling point or range	Not applicable	
Specific gravity	1.53 at 22 °C	
Vapour pressure	1×10^{-5} Pa at 25 °C	Relatively non-volatile under field conditions
Henry's Law constant (*H*) at 20 °C	2.29×10^{-5} Pa m^3 mol^{-1}	Non-volatile from water or moist soil surface
Ultraviolet (UV) – visible spectrum	Medium / λmax Acidic: 259.8, 203.8 Basic: 262.4, 209.7 Methanolic: 204.1 No absorbance at λ > 300 nm	Low potential for phototransformation
Solubility in water	Medium / Solubility (g/L) water: 0.121 pH 5: 0.084 pH 7: 6.36 pH 9: 94.2	Soluble at pH 5 and very soluble at pH 7 and pH 9
Solubility in organic solvents	Solvent / Solubility (g/L) acetone: 123.0 acetonitrile: 72.1 ethyl acetate: 15.9 methanol: 9.81 dichloromethane: 3.75 xylene: 0.227 *n*-octanol: 0.184 *n*-heptane: 0.000019	

Property	Result	Comment
n-Octanol–water partition coefficient	pH / log K_{ow} 4 / 1.00 7 / –1.22 10 / –2.06	Bioconcentration is unlikely. Below TSMP cut-off criterion of 5.0
Dissociation constant	pK_a = 4.54	Neutral molecule will predominate at pH > 4.54. Adsorption will decrease as pH increases.
Stability (temperature, metals)	No degradation at elevated temperature or in the presence of metals (copper, brass and stainless steel) or metal ions (cuprous, nickel (II), ferric ions) was noted.	

End-use products: EF-1440, EF-1343 and EF-1343 4SC

Property	EF-1440	EF-1343	EF-1343 4SC
Colour	Off-white	White, opaque	
Odour	Musty	No discernible odour	
Physical state	Viscous liquid	Liquid	
Formulation type	Manufacturing concentrate	Suspension concentrate	
Guarantee	45% (limits: 43.65–46.35%)	4.84% (limits: 4.60–5.08%)	50 g/L (limits: 47.5–52.4 g/L) or 4.84% (4.6–5.08%)
Container material and description	25 L HPDE drum	HDPE bottle	Cylindrical, injection stretch-blown moulded PET bottle: 1 L
Specific gravity	1.23	1.0318	
pH of 1% dispersion in water	4.99	4.36	
Oxidizing or reducing action	No redox reaction	Reacted with K_2MnO_4 solution (by colour change from purple to brown). Non-reactive towards $(NH_4)H_2PO_4$, zinc dust and water	

Property	EF-1440	EF-1343	EF-1343 4SC
Storage stability	4% decrease in active ingredient content after 12 months at ambient in 25 L HDPE containers	Stable in HDPE and PET bottles after 24 months at ambient	
Explodability	None	Not explosive	

1.3 Details of uses

EF-1343 Suspension Concentrate Herbicide is proposed for use on spring wheat, including durum, spring barley and oats (in tank mixture only) at a rate of 100 mL/ha of product (5 g a.i./ha). Accordingly, the product is to be used only in the prairie provinces and Peace River region of British Columbia, which are the major cereal production areas of Canada. Applied alone, EF-1343 is to be mixed with Agral 90 at 0.2% v/v. Broadleaf weeds listed for control by EF-1343 applied alone include: volunteer canola (*Brassica napus*) (including Roundup Ready and Liberty Link), common chickweed (*Stellaria media*), cleavers (*Galium aparine*), shepherd's purse (*Capsella bursa pastoris*), smartweed (*Polygonum persicaria*), stinkweed (*Thlaspi arvense*), wild buckwheat (*Polygonum convolvulus*) and wild mustard (*Sinapis arvensis*). Weeds listed for suppression are: hempnettle (*Galeopsis tetrahit*), redroot pigweed (*Amaranthus retroflexus*), annual sowthistle (*Sonchus oleraceus*) and perennial sowthistle (*Sonchus arvensis*).

EF-1343 is proposed for use as a single application per season, applied by ground equipment only, in a water volume of 50–100 L/ha on cereals from the 2-leaf stage up to and including the flag leaf extended stage. Weeds should be in the 2- to 4-leaf stage at the time of application. EF-1343 Suspension Concentrate Herbicide is proposed for two-way tankmix applications with MCPA LV 500 and Curtail M Herbicide. In addition, tank mixtures to extend weed control to include control of certain annual grass species are proposed by adding one of the following products to either the MCPA LV 500 or Curtail M tank mixtures: Assert 300 SC Herbicide; Horizon Herbicide; or Puma Super Herbicide.

2.0 Methods of analysis

2.1 Methods for analysis of the active substance as manufactured

Product	Analyte	Method no.	Method type	Recovery (%)	RSD (%)	Method acceptability
Technical	Florasulam	EU-AM-97-001	High performance liquid chromatography (HPLC) – UV	99.4	0.3	Acceptable
Technical	Major impurities	EU-AM-97-002	HPLC–UV	97–102	0.7–7.6	Acceptable

2.2 Method for formulation analysis

Product	Analyte	Method no.	Method	Mean recovery	SD	Method acceptability
EF-1440	Florasulam	Not required for manufacturing concentrate				
EF-1343 and EF-1343 4SC	Florasulam	EU-AM-96-005	HPLC	98% (n = 7)	0.83% (n = 5)	Acceptable

2.3 Methods for residue analysis

MULTI-RESIDUE METHODS FOR RESIDUE ANALYSIS
Protocols from existing multi-residue methods were not found to be suitable for the determination of florasulam.

METHODS FOR RESIDUE ANALYSIS OF PLANTS AND PLANT PRODUCTS
Data gathering method
Immunoassay method
Limit of quantitation (LOQ) = 0.01 parts per million (ppm) for grain and 0.05 ppm for forage, hay, straw, immature green plants and immature dry plants (wheat, barley and oat)

Residue of concern: The residue of concern (ROC) was defined as the parent florasulam.

Matrix	Wheat, grain	Wheat, forage	Wheat, hay	Wheat, straw	Wheat, immature green plants	Wheat, immature dried plants
Spiking levels (ppm)	0.01–0.2	0.05–1.0	0.05–1.0	0.05–1.0	0.05–1.0	0.05–1.0
Range of recoveries (%)	76–136 (n = 12)	90–120 (n = 12)	81–110 (n = 12)	88–114 (n = 12)	96–122 (n = 12)	108–126 (n = 12)
Recovery mean ± SD (%)	97 ± 13	105 ± 4	93 ± 6	98 ± 6	113 ± 7	116 ± 5

Confirmatory method
Capillary gas chromatography with mass selective detection (GC–MSD)
LOQ = 0.01 ppm for grain and 0.05 ppm for forage, hay, straw, immature green plants and immature dry plants (wheat, barley and oat)

ROC: The ROC was defined as the parent florasulam.

Matrix	Wheat, grain	Wheat, forage	Wheat, hay	Wheat, straw	Immature green plants	Immature dried plants
Spiking levels (ppm)	0.01–0.1	0.05–0.50	0.05–0.50	0.05–0.25	0.05–0.50	0.05–0.25
Range of recoveries (%)	74–83 (n = 5)	74–80 (n = 4)	79–92 (n = 4)	85–92 (n = 4)	71–79 (n = 4)	81–96 (n = 4)
Recovery mean ± SD (%)	80 ± 4	74 ± 2	84 ± 6	88 ± 3	75 ± 4	89± 8

Enforcement method
Enforcement method is equivalent to confirmatory method.

Interlaboratory validation (ILV)
Interlaboratory validation indicated good reliability and reproducibility.

2.4 Methods for environmental residue analysis

Matrix	Method	Fortification level (µg/kg)	Overall mean recovery (%)				LOQ (µg/kg)	Method acceptability
			Parent (XDE-570)	RSD (%)	5-OH XDE-570	RSD (%)		
Soil	HPLC–MS	0.05–50	95 (n = 20)	6.7	80 (n = 20)	10.6	0.05	Acceptable
	GC–MSD	1–100	85 (n = 19)	10–11	86 (n = 19)	7–20	0.93, 0.61[a]	Acceptable
Sediment	The applicant requested to use the soil method and provided scientifically sound rationale based on the chemical and physical properties and the extraction efficiencies using ^{14}C material in soil and in sediment.							Waiver accepted
Drinking water	HPLC–UV	0.05–1.00	99 (n = 20)	5.2	89 (n = 20)	10.3	0.05	Acceptable
Plant	The applicant requested that the analytical method used to quantify XDE-570 and metabolites in crops (wheat and barley) be extended to other flora.							Section 2.3
Animal matrix	The method was not requested, as the potential for bioaccumulation is low due to the very low log K_{ow} values (–2.32 to 1.00) for both parent and transformation product at pH 4–9.							

[a] For the two analytes, parent and degradation product (5-OH), respectively

3.0 Impact on human and animal health

3.1 Integrated toxicological summary

Florasulam was rapidly and extensively absorbed with maximal plasma concentrations being achieved within 0.5–1.0 h. Following single or repeat low-dose administration (10 mg/kg bw), greater than 90% of the administered dose was absorbed. Following single high-dose administration (500 mg/kg bw), greater than 80% of the administered dose was absorbed. Bile absorption accounted for approximately 1% of the administered dose within 24 h. Florasulam was rapidly excreted, within 24 h greater than 90% of the administered dose was excreted in the urine and feces. The major route of excretion was via the urine (greater than 80% of the administered dose). Fecal excretion was slightly higher at the high dose compared with the low dose (approximately 17 vs. 7% of the administered dose) There is little potential for accumulation. The highest residue levels were observed in the skin and carcass; however, less than 0.6% of the administered dose remained in the tissue or carcass at sacrifice (168 h post-dosing). Florasulam was not extensively metabolized, the unchanged parent compound, florasulam (XR-570), accounted for greater than 80% of the administered dose. Two other metabolites were identified as OH-phenyl-XR-570 (approximately 3–10% of the administered dose) and a sulfate conjugate of OH-phenyl-XR-570 (approximately 2–4% of the administered dose).

Technical florasulam has low acute toxicity by the oral, dermal and inhalation routes of exposure, is minimally irritating to the eyes and skin and is not considered to be a dermal sensitizer. The end-use products, EF-1343 Manufacturing Concentrate Herbicide (4.84% florasulam by weight), EF-1440 Manufacturing Concentrate Herbicide (45% florasulam by weight) and EF-1343 Suspension Concentrate Herbicide (4.84% florasulam by weight) have low acute toxicity by the oral, dermal and inhalation routes of exposure, are minimally irritating to the eyes and non-irritating to the skin and are not considered to be dermal sensitizers.

Florasulam was tested in a battery of in vitro (bacterial and mammalian cell gene mutation assays and mammalian cells chromosomal aberration assay) and in vivo (mouse micronucleus assay) mutagenicity studies. There was no evidence of genotoxicity potential in any of these assays; therefore, the weight of evidence suggests that florasulam was not genotoxic under the conditions of the tests performed.

The subchronic and chronic toxicity of florasulam was investigated in the mouse, rat and dog. A 28-d repeat dose dermal toxicity study was also carried out in rats. In the subchronic and chronic studies, treatment-related findings were observed in the kidney in all species and in the liver and adrenal glands in dogs. In the kidney, hypertrophy of the epithelial cells of the collecting ducts occurred in all species tested.

In the mouse, hypertrophy of the epithelial cells was observed in males at 500 mg/kg bw/d and above and in females at 1000 mg/kg bw/d in the 90-d dietary study and in both sexes at 500 mg/kg bw/d and above in the 2-year dietary study. The severity of the hypertrophy increased from very slight following 90 days to slight following

12 and 24 months exposure. In the 2-year dietary study, a decreased incidence of age-related tubular degeneration with regeneration was noted in females at 500 mg/kg bw/d and above at 12 months and at 1000 mg/kg bw/d at 24 months. In males, the incidence of age-related tubular degeneration with regeneration was comparable to controls at 12 and 24 months; however, the severity was decreased at 24 months at 500 mg/kg bw/d and above.

In the rat, hypertrophy of the epithelial cells was observed in both sexes at 500 mg/kg bw/d and above in the 90-d dietary study and in males at 250 mg/kg bw/d and above and in females at 125 mg/kg bw/d and above in the 2-year dietary study. The hypertrophy appeared to become more pronounced over time from 3 to 12 to 24 months. In the 90-d dietary study, hypertrophy of the epithelial cells correlated with urinary acidification (both sexes at 500 mg/kg bw/d and above), decreased urinary specific gravity (males at 1000 mg/kg bw/d) and increased kidney weights (both sexes at 500 mg/kg bw/d and above). In the 2-year dietary study, hypertrophy of the epithelial cells correlated with elevated serum bicarbonate levels (males at 500 mg/kg bw/d), urinary acidification (males at 250 mg/kg bw/d and above and in females at 125 mg/kg bw/d and above), reduced urinary specific gravity (males at 500 mg/kg bw/d) and increased kidney weights (males at 250 mg/kg bw/d and above and females at 125 mg/kg bw/d and above). Urine volume was not measured in either the 90-d or 2-year dietary study. In the 90-d dietary study, hypertrophy of the epithelial cells and urinary acidification appeared to be reversible following the 4-week recovery period, however, urinary specific gravity continued to be lower and kidney weights continued to be higher at the high dose.

In the rat 90-d dietary study, other histopathological findings in the kidney included degeneration with regeneration in the descending portion of the proximal tubules (females at 500 mg/kg bw/d and above) which was considered to be typical of acute necrosis with regeneration rather than a 90-d old lesion and multi-focal mineralization in the papilla (females at 800 mg/kg bw/d). These lesions did not appear to be reversible. In the rat 2-year dietary study, other histopathological findings in the kidneys included a possible slight decreased incidence of age-related tubular degeneration/regeneration and a decreased severity of spontaneous geriatric renal degeneration (chronic progressive glomerularnephropathy) in males at 250 mg/kg bw/d and above, slight decreased incidence of spontaneous geriatric renal disease in females at 250 mg/kg bw/d and minimal reactive hyperplasia of the transitional epithelium and unilateral necrosis of the papilla in males at 500 mg/kg bw/d. The high-dose males also exhibited decreased proteinuria, which was considered to represent less severe chronic renal disease although the decreased specific gravity suggest that dilution may have also contributed to lower values. Body weight and body-weight gain were significantly lower in males at 1000 mg/kg bw/d and in females at 500 mg/kg bw/d and above in the 90-d dietary study and in males at 500 mg/kg bw/d (highest dose tested [HDT]) and in females at 250 mg/kg bw/d (HDT) in the 2-year dietary study. This was associated with concomitant lower food consumption in the high-dose animals in the both 90-d and 2-year dietary study.

In a 28-d repeat-dose dermal toxicity study in rat, there were no treatment-related systemic findings at dose levels up to and including 1000 mg/kg bw/d, the HDT.

In the dog, an increased incidence and severity of hypertrophy of the epithelial cells was observed in both sexes at 50 mg/kg bw/d and above in both the 90-d and 1-year dietary study. There were no treatment-related urinalysis findings in either the 90-d or 1-year dietary study. The severity (slight) of the hypertrophy did not appear to increase with prolonged exposure. In the 90-d dietary study treatment-related findings associated with the liver included increased alkaline phosphatase (ALP) activity in both sexes at 50 and 100 mg/kg bw/d, increased liver weights in both sexes at 100 mg/kg bw/d and a slight increased incidence or severity of hepatic vacuolation in both sexes at 50 and 100 mg/kg bw/d. Increased liver weights and hepatic vacuolation were not observed in the 1-year dietary study. In the 1-year dietary study, treatment-related findings associated with the liver, included increased alanine aminotransferase (ALAT) and ALP activity and decreased serum albumin and protein levels in both sexes at 100 mg/kg bw/d. After the high dose was reduced to 50 mg/kg bw/d (week 15), ALP activity remained elevated and serum albumin and protein levels remained lower in both sexes. In the 1-year dietary study, no histopathological findings were evident in the liver. In the 1-year dietary study, slight vacuolization of the zona reticularis and zona fasciculata in the adrenal glands was observed in the high-dose males and females; however, in the absence of any associated inflamation, necrosis or other changes, the toxicological significance of this finding was uncertain. The vacuolization was consistent with fatty changes. Body weight, body-weight gain and food consumption were significantly lower in both sexes at 100 mg/kg bw/d and remained lower in the high-dose females after the high dose was reduced in the 1-year dietary study. Body weight, body-weight gain and food consumption were unaffected by treatment in the 90-d dietary study.

No evidence of an oncogenicity potential of florasulam was found in the oncogenicity and chronic toxicity studies performed on the mouse or rat. With the exception of a slight increased severity in the hypertrophy of the epithelial cells of the collecting duct in mice and rats, there was no evidence to suggest a significant increase in toxicity with increased duration of exposure in mouse, rat or dog. No significant gender sensitivity was evident in any species.

The primary renal histopathological change associated with dietary exposure to florasulam was hypertrophy of the epithelial cells of the collecting ducts, which was observed in all species tested. With the exception of elevated serum bicarbonate levels in the high-dose males in the rat 2-year dietary study, there were no toxicologically relevant clinical chemistry findings (serum creatinine, nitrogen or electrolyte levels) to correlate with urinalysis findings in the rat or with hypertrophy of the epithelial cells in the mouse, rat and dog or to indicate an impairment of renal function in any species tested. There was no significant increased incidence of cellular degeneration or necrosis evident in the kidneys in any species tested. Renal function did not appear to be compromised in any species tested and continued ingestion of the test substance did not result in significant deterioration of renal function nor in the development of renal tumours. Functional

abnormalities of the collecting duct manifest primarily as an acidification defect and as impaired concentrating ability.

From the histological and ultrastructural appearance of the hypertrophied cells, the site within the collecting duct where they were present and from urine pH changes, it is likely that the cells affected due to florasulam ingestion are the α-intercalated cells. Hypertrophy of the α-intercalated cells have been reported as a physiological response to several factors affecting acid–base homeostasis, including acute respiratory acidosis and metabolic acidosis. Other potential mechanisms include hypokalemia, altered levels of adrenal mineral corticoids, carbonic anhydrase inhibition and HCO^{3-}/Cl^{-} exchange in the basolateral membrane. Although data are limited, it was concluded that none of these appeared to be the underlying cause of the changes associated with florasulam ingestion. Florasulam may have acted directly on the α-intercalated cells by some unknown mechanism to cause the hypertrophy along with secondary functional effects. However, the continued ingestion of florasulam did not result in apparent deterioration of renal function or in renal tumours and the hypertrophy and urinary acidification appeared to be reversible.

In the rat, reproduction function, reproductive parameters and litter parameters were not influenced by treatment in the P_1 and P_2 parental animals at any dose levels up to and including 500 mg/kg bw/d (HDT). Parental treatment-related findings included lower body weight, body-weight gain and food consumption (P_2 males and P_1 and P_2 females), increased kidney weights (P_2 males and P_1 and P_2 females) and hypertrophy of the epithelial cells of the collecting duct (P_1 and P_2 in both sexes) at 500 mg/kg bw/d. Sexual maturation of the external sexual organs was unaffected by treatment in the F_1 male and female weanlings. Body weights at birth were comparable between the treatment groups and the controls for both F_1 and F_2 pups. A transient lower body weight was observed in the F_1 and F_2 male and female pups at 500 mg/kg bw/d on lactation days 4 and 7, by lactation day 14 pup body weight was comparable to controls. The transient lower pup body weight may be secondary to decreased maternal food consumption early in the lactation period. There were no other treatment-related findings in the F_1 or F_2 offspring. On the basis of the parental and offspring no observed adverse effect levels (NOAELs) in the rat 2-generation reproductive toxicity study (one litter/generation) there was no indication that neonates were more sensitive than adults to the toxic effects of florasulam.

There was no evidence of developmental toxicity in rats at any dose level up to and including 750 mg/kg bw/d (HDT) and in rabbits at any dose level up to and including 500 mg/kg bw/d (HDT). In the rat developmental study, treatment-related maternal findings included lower body weight, body-weight gain and food consumption and increased kidney weights at 750 mg/kg bw/d. In the rabbit developmental study, there were no treatment-related maternal findings at any dose level up to and including 500 mg/kg bw/d. There was no evidence of any irreversible structural changes in either species; therefore, florasulam was not considered to be teratogenic in rat or rabbit. On the basis of the maternal and developmental NOAELs in the rat and rabbit developmental studies, no increased susceptibility of the fetus to in utero exposure to florasulam was demonstrated in either species.

In rats, there were no significant treatment-related findings in the acute or subchronic neurotoxicity screening studies. As well, there was no evidence of neurotoxicity in the rest of the database. Therefore, florasulam was not considered to be neurotoxic.

3.2 Determination of acceptable daily intake

The most appropriate NOAEL of 5.0 mg/kg bw/d in the 1-year dietary study in dogs is recommended as the basis for the acceptable daily intake (ADI). Treatment-related findings at the lowest observed adverse effect level (LOAEL) (next highest dose level) included lower body weight, body-weight gain and food consumption (females), increased ALP activity (both sexes) and decreased serum albumin and protein levels (both sexes) at 50 mg/kg bw/d and increased severity of hypertrophy of the epithelial cells of the collecting ducts and slight vacuolization of the zona reticularis and zona fasciculata in the adrenal glands in both sexes at 100/50 mg/kg bw/d. A safety factor of 100 to account for intra- and inter-species variations was applied to this NOAEL to determine the ADI. No additional safety factor is required.

ADI calculation

$$\text{ADI} = \frac{\text{NOAEL}}{\text{Safety factor}} = \frac{5.0 \text{ mg/kg bw/d}}{100} = 0.05 \text{ mg/kg bw/d}$$

3.3 Acute reference dose

An acute reference dose (ARfD) was not established since florasulam was considered unlikely to present an acute hazard. There were no significant treatment-related findings in the acute, short-term, 2-generation reproduction or developmental toxicity studies or in the acute or subchronic neurotoxicity studies to indicate a concern for acute dietary risk.

3.4 Toxicological end point selection: occupational and bystander risk assessment

Technical florasulam is of low acute toxicity by the oral, dermal and inhalation routes of exposure, is minimally irritating to the eyes and skin and is not considered to be dermal sensitizer. The end-use products, EF-1343 Manufacturing Concentrate Herbicide, EF-1440 Manufacturing Concentrate Herbicide and EF 1343 Suspension Concentrate Herbicide have low acute toxicity by the oral, dermal and inhalation routes of exposure, they are non-irritating to the skin and minimally irritating to the eyes and are not considered to be dermal sensitizers.

Florasulam was rapidly and extensively absorbed with maximal plasma concentrations being achieved within 0.5–1.0 h. Florasulam was rapidly excreted with >90% of the administered dose excreted within 24 h. The major route of excretion was via the urine. There is little potential for accumulation. Florasulam was not extensively metabolized, the unchanged parent compound, florasulam (XR-570), accounted for >80% of the administered dose. Two other metabolites were identified as OH-phenyl-XR-570 (≈3–10% of the administered dose) and a sulfate conjugate of OH-phenyl-XR-570 (≈2–4% of the administered dose).

In subchronic and chronic dietary studies, treatment-related findings were observed in the kidneys in mice, rats and dogs and in the liver and adrenal glands in the dog. In the kidney, hypertrophy of the epithelial cells of the collecting duct was observed in all species tested. In rats, hypertrophy of the epithelial cells correlated with elevated serum bicarbonate levels, urinary acidification, decreased urinary specific gravity and increased kidney weights. In dogs, treatment-related findings associated with the liver included increased ALP activity, decreased serum albumin and protein levels, increased liver weights and increased incidence or severity of hepatic vacuolation. Dogs also exhibited slight vacuolization of the zona reticularis and zona fasciculata in the adrenal glands; however, in the absence of any associated inflammation, necrosis or other changes, the toxicological significance was uncertain. The most appropriate NOAEL for subchronic and chronic toxicity end points is 5.0 mg/kg bw/d in the 90-d and 1-year dietary studies in dogs. At the LOAEL, 50 mg/kg bw/d, treatment-related findings were observed in the kidneys and liver in the 90-d and 1-year dietary studies and in the adrenal glands in the 1-year dietary study.

Florasulam was not carcinogenic, genotoxic or neurotoxic. With the exception of a slight increased severity in the hypertrophy of the epithelial cells of the collecting duct in mice and rats, there was no evidence to suggest a significant increase in toxicity with increased duration of exposure in mouse, rat or dog. No significant gender sensitivity was evident in any species.

Florasulam is not a developmental or reproductive toxicant. There was no indication from the 2-generation reproductive toxicity study (one litter per generation) that neonates were more sensitive than adults to the toxic effects of florasulam. No increased susceptibility of the fetus to in utero exposure to florasulam was demonstrated in rats and rabbits. There was no evidence of teratogenicity in the rat or rabbit developmental studies.

Given the potential for short-term exposure for farmers and intermediate-term exposure for custom applicators, and the predominantly dermal exposure route, a short-term repeat-dose dermal toxicity study is considered to be the most relevant to use in the occupational risk assessment. In a 4-week dermal toxicity study in rat, there were no treatment-related systemic findings in either sex. Local irritation findings included slight transient erythema and edema at the application site in males at 1000 mg/kg bw/d. The LOAEL for systemic toxicity was not determined. The NOAEL for systemic toxicity was 1000 mg/kg bw/d, the HDT.

For the identified toxicity end points, a safety factor of 100 to account for intra- and inter-species variation is considered to be adequate for operator exposure.

3.5 Impact on human and animal health arising from exposure to the active substance or to its impurities

3.5.1 Operator exposure assessment

EF-1343 is a selective herbicide for post-emergent control of annual broad-leaved weeds in spring wheat (including durum), spring barley and oats (as a tankmix only). It is formulated as a suspension in 800 mL plastic bottles for dilution in water with adjuvant and for application by groundboom spray. The label specifies an application rate of 100 mL product/ha (5 g a.i./ha) once per season between the 2-leaf and flag-leaf stages (early growth period).

There is a potential for short-term to intermediate term exposure to custom applicators who mix, load and apply daily, for a period of approximately 3 weeks. For cereal crops, a custom applicator can spray up to 400 ha per day, handling up to 2 kg a.i./d. The personal protective equipment (PPE) specified on the label for all activities includes a single layer consisting of clean clothing with full-length sleeves and pants, and for mixing, loading, clean-up and repair includes chemical-resistant gloves.

Dermal absorption

Male Fischer 344 rats (4/dose/time-to-sacrifice) were administered undiluted or diluted EF-1343 formulation to receive 0.009 or 0.53 mg/cm^2 skin of ^{14}C-XDE-570 (10 μL/cm^2) for a 24-h exposure period. The treated skin was washed at 24 h post-dosing and tape-stripped at sacrifice times of 24, 48 or 72 h post-dosing. Urine and feces were collected from 0 to 24, 24 to 48 and 48 to 72 h post-dosing. Tissues samples (blood, liver, kidney and treated and untreated skin) and carcass were collected at time of sacrifice.

In both the low- and high-dose groups, the majority of the applied dose (71–90%) was removed in the skin wash at 24 h post-dosing. In the low-dose groups, a total of 12–22% of the applied dose was found in the urine, feces, metabolism cage washes, tissues, carcass and untreated and treated skin residues, the majority of which (99%) was from skin residues. In the high-dose group, a total of 10–11% of the applied dose was found in the urine, feces, tissues, carcass, untreated and treated skin, the majority of which (95–99%) was from skin residues. No significant difference or trend was observed in skin residues with time-to-sacrifice.

The Health Evaluation Division recommends a dermal absorption value of 22%. This estimate is considered conservative based on the observation that the majority of the dose is retained in the treated skin and not considered likely to become systemically available in total, and that the study's exposure period (24 h) is greater than anticipated in the field and thus uptake of the applied dose has been maximized in this study.

Exposure assessment

The Pesticide Handlers Exposure Database (PHED) Version 1.1 data provided an adequate basis for estimating operator exposure for the proposed use. The data were based on high confidence PHED runs with similar PPE as proposed on the label, adequate numbers of replicates and A and B grade data. PHED data does not provide exposure estimates for clean-up or repair activities nor quantify the variability of exposure estimates.

Total daily exposure was estimated for custom application of 2 kg/d of florasulam to 400 ha of cereal crops per day by groundboom (including mixing and loading). For mixing and loading, exposure was estimated from PHED subsets for single layer protection and gloves. For the application, exposure was estimated from PHED subsets for single layer protection without gloves. Exposure estimates were based on best fit statistical analyses. Unit exposure estimates (μg a.i./kg active ingredient handled) were based on total dermal and inhalation deposition and adjusted for dermal absorption of 22%.

The primary route of exposure was dermal. Inhalation exposure accounted for 3% of the total deposited dose and 12% of the total absorbed dose. The mixer and loader exposure contributed 61% of the total daily exposure.

For custom applicators mixing, loading and applying 2 kg of active ingredient per day to 400 ha of cereal crops using groundboom equipment and wearing a single layer of protective clothing and gloves during mixing and loading, the total daily exposure was estimated to be 2.48 μg a.i./kg bw/d and the total daily systemic dose was estimated to be 0.6 μg/kg bw/d, based on a dermal absorption value of 22%. Exposure to farmers who mix, load and apply is expected to be lower than custom applications.

The exposure estimate and margin of exposure (MOE) for custom applicators mixing, loading and applying are presented in the table below.

For custom mixers, loaders and applicators, an acceptable MOE of 400 000 was attained based on total exposure (from dermal and inhalation routes of exposure) and the NOAEL of 1000 mg/kg bw/d from the 28-d rat dermal study. A novel toxicity end point (liver effects) was observed in the dog (90-d) and, although the study is more appropriate for exposure of longer duration, an acceptable MOE of 8000 was attained for systemic exposure.

Exposure estimates and resulting MOEs

Exposure scenario	Daily exposure[a] (mg a.i./kg bw/d)	Toxicity end point (mg/kg bw/d)	MOE
Wheat, barley and oats custom mixer, loader and applicator	0.0025	28-d dermal: rat NOAEL = 1000	400 000

[a] Sum of mixer + loader + applicator dermal and inhalation exposures

3.5.2 Bystanders

For the proposed agricultural use scenarios, bystander exposure is considered minimal.

3.5.3 Post-application exposure

Re-entry activities for cereals crops include scouting and mechanical harvesting and involve minimal contact with treated foliage. Post-application exposure is considered minimal.

4.0 Residues

4.1 Residue summary

The nature of the residue in plant (wheat) and animals (lactating goat and laying hen) is adequately understood. The ROC in plant and animal products is the parent compound, florasulam. The data gathering and enforcement analytical methodology (GC–MSD) is valid for the quantitation of florasulam residues in the food matrices on the label. The residues of florasulam are stable under freezer storage at –20°C, for up to 264, 378, 313, 350, 94 and 94 days in grain, forage, straw, hay, immature green plants and immature dried plants, respectively. Supervised residue trials were conducted in Canada and the U.S., applying EF-1343 Suspension Concentrate at 10 g a.i./ha (twice the Canadian proposed rate) with 0.2% (v/v) Agral 90 Adjuvant, on wheat, barley and oats.

The Dietary Exposure Evaluation Model™ (DEEM™) Software (Version 7.62; customized for Canada), which utilized data from the U.S. Department of Agriculture 1994–1998 Continuing Survey of Food Intake by Individuals (CSFII), was used for purposes to assess the potential chronic dietary exposure to residues of florasulam resulting from the proposed uses on wheat, barley and oats. The Tiers I and II assessments were carried out using the proposed Canadian maximum residue limits (MRLs) and Supervised Trial Median Residue, respectively, for wheat, barley and oats. Drinking water was included as 10% of the potential daily intake. It was estimated that chronic dietary exposure to florasulam from food and water will utilize 10% of the ADI (0.05 mg/kg/d) for the total population, including infants, children, adults and seniors. Consequently, the consumption estimates coupled with the MRLs indicate that there is adequate protection of the consumer, including infants, children, adults and seniors, from

dietary residues of florasulam following use in accordance with good agricultural practice (GAP).

Based on our evaluation, it is concluded that the following MRL should be promulgated in Table II of Division 15 of the Food and Drug Regulations: residues of florasulam in or on wheat (0.01 ppm), barley (0.01 ppm) and oats (0.01 ppm). Neither U.S. tolerances nor CODEX CXLs are established at this time.

5.0 Fate and behaviour in the environment

5.1 Physical and chemical properties relevant to the environment

The solubility of florasulam in reagent water at pH of 5, 7 and 9 is 0.084, 6.36 and 94.2 g/L, respectively. Florasulam is soluble at pH 5 and very soluble at pH 7 and 9. The vapour pressure is 1×10^{-5} Pa at 25°C, indicating that florasulam is relatively non-volatile under field conditions. Based on the values for solubility in pure water, vapour pressure and the molecular weight, H is 2.97×10^{-5} Pa m^3 mol^{-1} (or 2.93×10^{-10} atm m^3 mol^{-1}). This value indicates that florasulam is non-volatile from water or moist soil surfaces. The log K_{ow} values are 1.00, –1.22 and –2.06 for pH 4, 7 and 10, respectively, indicating that bioconcentration or bioaccumulation is unlikely. The pK_a is 4.54 ± 0.06. This indicates that the cation will predominate at pH <4.54 and that adsorption will decrease as pH increases. The UV and visible absorption maxima are at 259.8 and 203.8 nm, respectively, in the acidic form, and at 262.4 and 209.7 nm, respectively, in the basic form. No absorption maxima are observed at wavelengths greater than 300 nm, indicating that florasulam has a low potential for phototransformation. The physical and chemical properties of florasulam relevant to the environment are summarized in Table 2, Appendix III.

For the primary transformation product from most transformation processes, 5-hydroxy-XDE-570 [*N*-(2,6-difluorphenyl)-8-fluoro-5-hydroxy (1,2,4)triazolo(1,5*c*)pyrimidine-2-sulphonamide], the solubility in reagent water at pH 5, 7 and 9 is 0.633, >450 and >800 g/L, respectively. 5-Hydroxy-XDE-570 is very soluble at these pH values. The vapour pressure is 2.7×10^{-6} Pa at 25°C and the H is 2.63×10^{-6} Pa m^3 mol^{-1}, indicating that 5-hydroxy-XDE-570 is relatively non-volatile under field conditions and from water or moist soil surfaces. The log K_{ow} values are 0.32, –1.85 and –2.32 for pH 5, 7 and 9, respectively, indicating that bioconcentration or bioaccumulation is unlikely. The pK_a values are 4.53 and 7.22. This indicates that the cation will predominate at pH <4.53, the anionic form will predominate at pH >7.22 and adsorption will decrease as pH increases. The physical and chemical properties of 5-hydroxy-XDE-570 relevant to the environment are summarized in Table 3, Appendix III.

5.2 Abiotic transformation

Florasulam does not hydrolyse at pH 5 and 7, but hydrolyses slowly at pH 9 with a first-order half-life ($t_{½}$) of 100 days at 25°C and 226 days at 20°C. Two major hydrolysis transformation products are formed at pH 9, 5-hydroxy-XDE-570 and a product that might be formed by addition of water to the triazolopyrimidine ring of the parent compound. The $t_{½}$ for phototransformation of florasulam on soil was estimated to be 62 days. The major phototransformation products on soil were 5-hydroxy-XDE-570 and one tentatively identified as aminyltriazolopyrimidine-florasulam. The $t_{½}$ for phototransformation of florasulam in water was estimated as 223 days in May and 88 days in June. The major phototransformation product in water was triazolopyrimidine sulphonic acid-florasulam. No significant amounts of volatile transformation products or CO_2 are produced by these transformation processes. Therefore, abiotic transformation is not an important route of transformation of florasulam.

5.3 Biotransformation

In aerobic soil, florasulam transforms by microbiological processes to produce a number of transformation products, non-extractable soil residues or CO_2. The half-life of florasulam ranges from 0.7 to 8.3 days. The major transformation products are 5-hydroxy-XDE-570, DFP-ASTCA, ASTCA and TSA. The half-life of 5-hydroxy-XDE-570 in aerobic soil ranges from 10 to 56 days. Florasulam is classified as non-persistent in aerobic soil, whereas the major transformation product, 5-hydroxy-XDE-570, is non-persistent to moderately persistent. Biotransformation is an important route of transformation of florasulam in the aerobic soil.

In aerobic water and sediment, the half-life of florasulam is 3 days. The major transformation products are 5-hydroxy-XDE-570, DFP-ASTCA and one tentatively identified as STCA. The half-life of 5-hydroxy-XDE-570 is 169 days. The bound residues reached 11% of applied and only 0.1–2.7% of the recovered radioactivity was present as $^{14}CO_2$ at the end of the study. Florasulam biotransforms to 5-hydroxy-XDE-570, which then transforms to DFP-ASTCA and the remaining transformation products. Florasulam is non-persistent and it is not expected to accumulate in natural sediments. 5-Hydroxy-XDE-570 is persistent in the aerobic water and sediment system. Biotransformation is an important route of transformation of florasulam in aerobic aquatic systems.

In aerobic water and anaerobic sediment, the half-life of florasulam is 8.7–18 days. Florasulam is non-persistent to slightly persistent. The major transformation products are 5-hydroxy-XDE-570, DFP-ASTCA and a relatively unstable intermediate transformation product between the 5-hydroxy-XDE-570 and DFP-ASTCA, which is readily broken down to DFP-ASTCA. The half-lives of 5-hydroxy-XDE-570 were 69 and 244 days and, therefore, it is moderately persistent to persistent. The bound residues reached 9–11% of applied at study termination. Released $^{14}CO_2$ amounted to 1.9–8% of applied and there were no volatile organics. Florasulam biotranforms to 5-hydroxy-XDE-570, then subsequently to each of the other products. Biotransformation is an important route of transformation of florasulam in the aerobic water and anaerobic sediment system.

In anaerobic water and soil or water and sediment, the half-life of florasulam is <2 to 13 days. Florasulam is non-persistent. The major transformation product is 5-hydroxy-XDE-570, which is persistent. Florasulam biotransforms to 5-hydroxy-XDE-570, which further slowly transforms to the minor transformation product. No significant amounts of volatile transformation products are produced and the mineralization to CO_2 is minimal. Bound residue increases steadily, but very slowly, and never reaches 10% of the applied over the 12-month study period. Biotransformation is an important route of transformation in anaerobic aquatic environment.

In conclusion, florasulam is non-persistent in soil and water and sediment systems. The primary transformation product, 5-hydroxy-XDE-570, is non-persistent to moderately persistent in aerobic soil and persistent in aquatic systems. Biotransformation is an important route of transformation of florasulam.

5.4 Mobility

The results from the laboratory adsorption and desorption studies indicate that florasulam and the transformation product, 5-hydroxy-XDE-570, are highly to very highly mobile in soil. The soil column leaching studies show that florasulam and 5-hydroxy-XDE-570 have very high leaching potential.

The vapour pressure and *H* of florasulam and 5-hydroxy-XDE-570 indicate that they are relatively non-volatile under field conditions and non-volatile from a water surface or moist soil. This is confirmed by the results from the transformation studies that show that, under laboratory conditions, no volatile transformation products other than CO_2 are produced following application of florasulam to soil or aquatic systems.

The high solubility of florasulam in water indicates that it will primarily partition to the water phase. In addition, the relatively rapid biotransformation of florasulam in both soil and water and the low K_d and K_{oc} values indicate a low potential for accumulation of this compound in sediment. This was confirmed by the results of the aquatic biotransformation studies conducted with water and sediment systems.

The solubility of 5-hydroxy-XDE-570 is also high, which indicates that it will mainly remain in water phase and partitioning to sediment will be low. The adsorption coefficients, K_d and K_{oc}, indicate low adsorption of this compound to soil or sediment. This transformation product is persistent in both water and sediment.

5.5 Dissipation and accumulation under field conditions

Under field conditions, florasulam had DT_{50} values of 2–10 days and DT_{90} values of 16–34 days. No florasulam was detected after 2 months and, therefore, carry-over of the parent compound into the following season would not be expected. Florasulam is non-persistent. The major transformation product, 5-hydroxy-XDE-570, amounted for up to 59% of the amount applied under field conditions. 5-Hydroxy-XDE-570 can persist

and carry over. Florasulam and 5-hydroxy-XDE-570 have the potential to leach under conditions of excessive rainfall or irrigation.

5.6 Bioaccumulation

The log K_{ow} values were 1.00, –1.22 and –2.06 at pH 4, 7 and 10, respectively, for florasulam, and 0.32, –1.85 and –2.32 for pH 5, 7 and 9, respectively, for 5-hydroxy-XDE-570. These values indicate a negligible potential for bioaccumulation for both the parent compound and the major transformation product. Mammalian toxicology studies confirmed the low potential for the parent to accumulate.

5.7 Summary of fate and behaviour in the terrestrial environment

Florasulam does not hydrolyse at acidic or neutral pH, but hydrolyses slowly at basic pH. Phototransformation on soil occurs slowly. No significant amounts of volatile transformation products or CO_2 are produced by these transformation processes. In aerobic soil, florasulam is non-persistent. The primary transformation product, 5-hydroxy-XDE-570, is non-persistent to moderately persistent. Florasulam transforms by microbiological processes to produce a number of transformation products. Each of these transformation products, in turn, is transformed to either non-extractable soil residues or CO_2. Biotransformation is an important route of transformation of florasulam in the aerobic soil.

The results from the laboratory adsorption and desorption studies indicate that florasulam and 5-hydroxy-XDE-570 are highly to very highly mobile. Soil column leaching studies show that florasulam and 5-hydroxy-XDE-570 have very high leaching potential. Based on the vapour pressure and *H*, both the parent compound and the major transformation product are non-volatile.

Under field conditions, florasulam is non-persistent. Carry-over of this compound into the following season is not expected. The major transformation product, 5-hydroxy-XDE-570, can persist and carry over at high concentrations. Florasulam and 5-hydroxy-XDE-570 can leach when there is excessive rainfall or irrigation.

Based on log K_{ow} values, the potential for bioaccumulation for both the parent compound and the major transformation product is negligible.

The fate and behaviour data are summarized in Table 4, Appendix III and the transformation products are summarized in Table 5, Appendix III.

5.8 Summary of fate and behaviour in the aquatic environment

Florasulam may enter aquatic environments through drift, run-off or leaching. Under field conditions, leaching to ground water can occur if there is excessive rainfall or irrigation.

Phototransformation of florasulam in water is slow. Abiotic transformations (i.e., hydrolysis and phototransformation) are not an important route of transformation of florasulam in aquatic environments.

Biotransformation is an important route of transformation of florasulam in aquatic environments. In water and sediment systems, florasulam is non-persistent and it is not expected to accumulate in natural sediments. 5-Hydroxy-XDE-570 is persistent. Both the parent compound and the transformation product associate mainly with the water phase. Florasulam biotranforms to 5-hydroxy-XDE-570, which then transforms to each of the remaining transformation products. No significant amount of volatile transformation products and CO_2 are produced.

The fate and behaviour data are summarized in Table 6, Appendix III and the transformation products are summarized in Table 7, Appendix III.

5.9 Expected environmental concentrations

5.9.1 Soil

The concentration of florasulam in a 15 cm depth of soil immediately after application to the soil surface at the maximum label rate of 5 g a.i./ha will be 0.0022 mg a.i./kg soil, assuming soil bulk density of 1.5 g/cm^3.

5.9.2 Aquatic systems

The concentration of florasulam in a 30 cm depth of water immediately after a direct overspray at the maximum label rate of 5 g a.i./ha will be 0.001667 mg a.i./L.

5.9.3 Vegetation and other food sources

Data that could be used to estimate the decrease in the concentration of florasulam on contaminated food sources for wildlife were not provided. Therefore, a scenario that assumes no transformation will occur on the surface of wildlife food sources was adopted. The estimated expected environmental concentrations (EECs) in vegetation were calculated using a nomogram from the U.S. Environmental Protection Agency (EPA) (Table 1, Appendix III). Based on these values, the estimated EEC in the diet of non-target species immediately after an application of florasulam at 5 g a.i./ha, expressed as mg florasulam/kg dw diet, for representative non-target species are 0.6, 0.17, 2.52, 2.51 and 3.31 for bobwhite quail, mallard ducks, rats, mice and rabbits, respectively.

5.9.4 Monitoring data

Not applicable.

6.0 Effects on non-target species

Most of the studies with non-target organisms were conducted with florasulam technical. The end-use formulation, EF-1343, was the test material in the vascular plant seedling emergence and vegetative vigour studies, a daphnid acute study, a rainbow trout acute study, a green algae biomass study, and four qualitative predatory and parasitic arthropod studies. The toxicity of 5-hydroxy-XDE-570 was examined in an earthworm acute study, a daphnid acute study, a rainbow trout acute study, and a green algae acute study. The toxicity of the transformation products DFP-ASTCA, ASTCA, TSA, STA and STCA were also studied in an acute earthworm study.

6.1 Effects on terrestrial organisms

Florasulam is relatively non-toxic to bees on acute oral and contact basis. It is slightly toxic to Japanese quail on acute oral basis and practically non-toxic to Japanese quail and mallard duck on a dietary basis. Acute oral data indicate that florasulam is practically non-toxic to rat and mouse, and that it has low toxicity to rat and rabbit as demonstrated by acute inhalation data. Florasulam at rates up to 1300 mg a.i./kg soil (equivalent to 2790 kg a.i./ha) is not toxic to earthworm on a 14-d acute basis. In the terrestrial vascular plant seedling emergence test, florasulam is toxic to radish with a concentration effective against 25% of test organisms (EC_{25}) of 4.3 g a.i./ha, when applied as the formulation EF-1343. Significant phytotoxicity was observed on the dicot species with a most sensitive EC_{25} of 0.02 g a.i./ha on tomato. 5-Hydroxy-XDE-570 is also relatively non-toxic to earthworm. The effects on terrestrial organisms are summarized in Table 8, Appendix III.

6.2 Effects on aquatic organisms

Florasulam is practically non-toxic to daphnids, rainbow trout and bluegill sunfish. The acute values for grass shrimp, oyster shell deposition and silverside indicated that florasulam is also practically non-toxic to crustaceans, mollusks and marine fish. It is, however, toxic to freshwater and marine algae, and freshwater vascular plants. 5-Hydroxy-XDE-570 is practically non-toxic to daphnids and rainbow trout, but it is toxic to green algae with a no observable effect concentration (NOEC) of 6.64 mg a.i./L. The effects on aquatic organisms are summarized in Table 9, Appendix III.

6.3 Effects on biological methods of sewage treatment

Not applicable.

6.4 Risk characterization

6.4.1 Environmental behaviour

Florasulam is non-persistent in soil and water. It is not expected to volatilize from water or moist soils. The principal route of transformation is biotransformation in both soil and

water. Laboratory studies indicate that there is high to very high potential for florasulam to leach in soil and that leaching can be an important route of dissipation under field conditions when there is excessive seasonal rainfall or irrigation. Florasulam carry-over in the field is not expected. In water and sediment systems, florasulam is associated mainly with the water phase and is not expected to accumulate in natural sediments.

The major transformation product, 5-hydroxy-XDE-570, is non-persistent to moderately persistent in soil and persistent in aquatic systems. It is non-volatile. Laboratory studies indicate that it is also highly mobile and leachable in soil. In water and sediment systems, 5-hydroxy-XDE-570 is associated mainly with the water phase. It can persist and carry over in the field. Leaching to ground water can occur under field conditions when there is excessive rainfall or irrigation.

6.4.2 Terrestrial organisms

Margins of safety were calculated using the EEC values and the NOEC or an estimated NOEC equivalent to 1/10 of the median effective concentration (EC_{50}) or lethal concentration 50% (LC_{50}) for the most sensitive species per group.

Terrestrial invertebrates

The major route of exposure for earthworms is through ingested soil in treated fields. The margin of safety (MOS), based on a 14-d NOEC of 1300 mg a.i./kg soil, was calculated as 5.9×10^5 and thus, earthworms are not expected to be at risk from the proposed use of florasulam.

The major route of exposure to honey bee is through contact with contaminated plants. Using assumptions of Atkins et al. (1981), a NOEC of 100 μg a.i./bee is equivalent to a NOEC of 112 kg a.i./ha. Assuming a worst case of over spray, the EEC is the application rate, i.e., 5 g a.i./ha, and the MOS is, therefore, 2.2×10^4, indicating that bees are not at risk from the proposed application of florasulam.

Avian species

The major route of exposure to birds is through ingestion of food contaminated by florasulam. The number of days of intake of florasulam required to reach the no observable effect dose level (NOEL) is 1188 days. The Japanese quail, therefore, is not at risk on an acute oral basis. The margins of safety for dietary and reproductive effects, based on an 8-d NOEC of 5000 mg a.i./kg diet for Japanese quail and a reproductive NOEC of 1500 mg a.i./kg diet for bobwhite quail, are 8.3×10^3 and 2.5×10^3, respectively. Therefore, birds are not considered to be at risk from the proposed use of florasulam.

Small wild mammals

The major risk to small mammals is through ingestion of food sources contaminated by exposure to florasulam during and shortly after application. For acute oral toxicity (mouse), the MOS is expressed as 9.2 ×103 days of intake required to produce the equivalent of the dose administered to reach NOAEL in laboratory population. The MOS

for dietary toxicity (rat) is 643 based on the NOAEL of 100 mg a.i./kg bw/d (1621 mg a.i./kg dw diet). Based on a NOAEL of 100 mg a.i./kg bw/d (parental and offspring), the MOS for reproductive toxicity (rat) is also 643. Therefore, wild mammals are not at risk from the proposed use of florasulam.

Terrestrial plants
The most sensitive plant species tested was the tomato. Based on the EC_{25} value of 0.02 g a.i./ha (plant vigour), the MOS is 0.004. Therefore, florasulam poses a very high risk to non-target terrestrial plants.

In conclusion, the proposed use of florasulam would not expect to pose risk to terrestrial invertebrates, wild birds and mammals. However, it will pose a very high risk to certain non-target plants (Table 10, Appendix III).

6.4.3 Aquatic organisms

Freshwater invertebrates and fish
Based on the overspray scenario and a 48-h NOEC of 174 mg a.i./L for daphnids and a 96-h NOEC of 100 mg a.i./L for rainbow trout, the margins of safety for daphnids and rainbow trout are 1.04×10^5 and 6.00×10^5, respectively. Therefore, freshwater invertebrates and fish are not at risk from the proposed use of florasulam.

Freshwater plants
Similarly, based on the 72-h NOEC of 1.75 μg a.i./L for green algae biomass and a 14-d NOEC of 0.62 μg a.i./L for duckweed frond number, the margins of safety for algae and duckweed are 1.05 and 0.37, respectively. Therefore, the use of florasulam poses a low risk to freshwater algae and a moderate risk to aquatic vascular plants.

Marine species
Among crustaceans, mollusks, marine fish and marine algae, the marine algae is the most sensitive group. Based on a 5-d NOEC of 22.8 mg a.i./L for marine diatom, the MOS is 1.37×10^4. Therefore, marine species are not at risk from the proposed use of florasulam.

In conclusion, the proposed use of florasulam would not pose a risk to the freshwater invertebrates and fish, and various marine species. However, it will pose a low risk to freshwater alga and a moderate risk to aquatic vascular plants (Table 11, Appendix III).

6.4.4 Incident reports and additional considerations

Not applicable.

6.5 Risk mitigation

Leaching
Laboratory studies indicated a potential for mobility of florasulam and its major transformation product, 5-hydroxy-XDE-570, in soil. In three field studies conducted

under normal conditions of precipitation and irrigation, florasulam and the major transformation product did not leach. These three sites received irrigation equivalent to 110% of normal rainfall (30-year monthly average) during the growing season. Florasulam did, however, leach to a depth of 46 cm and 5-hydroxy-XDE-570 leached to a depth of 61 cm and, possibly, deeper depths at another site which received irrigation equivalent to 110% of normal rainfall plus typical irrigation for the growing season. This indicated that leaching can occur when excessive irrigation is applied. To mitigate the risk from leaching, the following label statement is required:

> "This product has the potential to leach. Do not apply excessive irrigation during and after application."

Persistence and carry-over of 5-hydroxy-XDE-570

The laboratory fate studies on the major transformation product, 5-hydroxy-XDE-570, indicate that it can be moderately persistent in soil and persistent in water and sediment systems. In the field dissipation study, no residue of 5-hydroxy-XDE-570 was detected 5 months after application at two test sites, but 17–28% was detected 15 months after application at two other test sites. This transformation product, therefore, has potential to persist and carry over. After three successive years of application, approximately 43% will persist in the soil. To mitigate the risk of persistence and carry-over of this transformation product, the following label statement is required:

> "Do not use in successive years at the same site."

Spray drift

Exposure to florasulam will pose a very high risk to non-target terrestrial plants and a moderate risk to aquatic vascular plants. These risks can be mitigated by the establishment of terrestrial and aquatic buffer zones. A buffer zone of 32 m is required to protect terrestrial non-target wildlife habitats for ground applications of florasulam products at rate of 5 g a.i./ha. This value is based on the EC_{25} for tomato. A buffer zone of 5 m is required for protection of aquatic habitats. The following label statement is required:

> "Overspray or drift to sensitive habitats should be avoided. A buffer zone of 30 metres is required between the downwind edge of the boom and the closest edge of sensitive terrestrial habitats including forested areas, shelter belts, woodlots, hedgerows, and shrub lands. A buffer zone of 5 metres is required between the downwind edge of the boom and the closest edge of sensitive aquatic habitats including sloughs, ponds, prairie potholes, lakes, rivers, streams, wetlands and wildlife habitats at the edge of these bodies of water. Do not contaminate these habitats when cleaning and rinsing spray equipment or containers.
>
> Do not apply during periods of dead calm or when winds are gusty.

When a tank mixture is used, consult the labels of the tankmix partners and observe the largest (most restrictive) buffer zone of the products involved in the tank mixture."

7.0 Efficacy

7.1 Effectiveness

7.1.1 Intended uses

EF-1343 Suspension Concentrate Herbicide is proposed for use on spring wheat, including durum, spring barley and oats (in tank mixture only) at a rate of 100 mL/ha of product (5 g a.i./ha). The product is proposed for use in the prairie provinces and Peace River region of British Columbia. Applied alone, EF-1343 is to be mixed with Agral 90 at 0.2% v/v. Weeds listed for control by EF-1343 applied alone include: volunteer canola (*Brassica napus*) (including Roundup Ready and Liberty Link), common chickweed (*Stellaria media*), cleavers (*Galium aparine*), shepherd's purse (*Capsella bursa pastoris*), smartweed (*Polygonum persicaria*), stinkweed (*Thlaspi arvense*), wild buckwheat (*Polygonum convolvulus*), and wild mustard (*Sinapis arvensis*). Weeds listed for suppression are: hempnettle (*Galeopsis tetrahit*), redroot pigweed (*Amaranthus retroflexus*), annual sowthistle (*Sonchus oleraceus*), and perennial sowthistle (*Sonchus arvensis*).

EF-1343 is proposed for a single application per season, applied by ground equipment only, in a water volume of 50–100 L/ha on cereals from the 2-leaf stage up to and including the flag leaf extended stage. Weeds should be in the 2- to 4-leaf stage at the time of application.

Tankmixes proposed for use with EF-1343 Suspension Concentrate Herbicide are summarized in Table 1, Appendix IV, along with proposed adjuvants for use in the tank mixtures (Table 2, Appendix IV).

7.1.2 Mode of action

Florasulam is a Group 2 herbicide acting as an inhibitor of acetolactate synthase (ALS). ALS is found in the chloroplast where it catalyses branch chained amino acid biosynthesis. Plant growth is inhibited within 2 h following treatment with florasulam. While cell division and plant growth are quickly affected, ultimate death of the plant is slow. The exact relationship between branch chained amino acid biosynthesis and plant death is unknown.

7.1.3 Crops

EF-1343 is proposed for use on spring wheat, including durum, spring barley and oats (in tank mixture only).

7.1.4 Effectiveness against pests

7.1.4.1 EF-1343 at 5 g a.i./ha with Agral 90 at 0.2% v/v

Volunteer canola
A total of 27 trials conducted over 3 years summarized control of this species. Late season control averaged 83% control, for all varieties of canola pooled. Late season control of glufosinate tolerant and glyphosate tolerant canola varieties averaged 94%. The label claim for control of volunteer canola including Liberty Link and Roundup Ready herbicide tolerant varieties is acceptable.

Common chickweed
Control of common chickweed was reported in 16 trials conducted over 3 years. Late season control averaged 94% with the treatment of EF-1343 at 5 g a.i./ha with Agral 90 at 0.2%. The label claim for control of common chickweed is acceptable.

Cleavers
Control of cleavers was reported in 21 trials conducted over 3 years. Late season control averaged 96% with the treatment of EF-1343 at 5 g a.i./ha with Agral 90 at 0.2%. The label claim for control of cleavers is acceptable.

Smartweed
Control of smartweed was reported in 22 trials conducted over 3 years. Late season control averaged 96% with the treatment of EF-1343 at 5 g a.i./ha with Agral 90 at 0.2%. The label claim for control of smartweed is acceptable.

Stinkweed
Control of stinkweed was reported in 18 trials conducted over 3 years. Late season control averaged 92% with the treatment of EF-1343 at 5 g a.i./ha with Agral 90 at 0.2%. The label claim for control of stinkweed is acceptable.

Wild buckwheat
Control of wild buckwheat was reported in 20 trials conducted over 3 years. Late season control averaged 89% with the treatment of EF-1343 at 5 g a.i./ha with Agral 90 at 0.2%. The label claim for control of wild buckwheat is acceptable.

Wild mustard
Wild mustard control was reported in 11 trials conducted over 2 years. Late season control averaged 97% with the treatment of EF-1343 at 5 g a.i./ha with Agral 90 at 0.2%. The label claim for control of wild mustard is acceptable.

Shepherd's purse
Shepherd's purse control was reported in 9 trials conducted over 3 years. Late season control averaged 95% with the treatment of EF-1343 at 5 g a.i./ha with Agral 90 at 0.2%. The label claim for control of shepherd's purse is acceptable.

Hempnettle
Control of hempnettle was reported in 13 trials conducted over 3 years. Late season control averaged 73% with the treatment of EF-1343 at 5 g a.i./ha with Agral 90 at 0.2%. The label claim for suppression of hempnettle is acceptable.

Redroot pigweed
Redroot pigweed control was reported in 12 trials conducted over 2 years. Late season control averaged 81% with the treatment of EF-1343 at 5 g a.i./ha with Agral 90 at 0.2%. The label claim for suppression of redroot pigweed is acceptable.

Annual sowthistle
Annual sowthistle control was reported in 6 trials conducted over 2 years. Late season control averaged 84% (based on 7 observations) with the treatment of EF-1343 at 5 g a.i./ha with Agral 90 at 0.2%. The label claim for suppression of annual sowthistle is acceptable.

Perennial sowthistle
Perennial sowthistle control was reported in 15 trials conducted over 2 years. The treatments were made to perennial sowthistle at leaf stages between 2- and 12-leaf. Late season control averaged 70% with the treatment of EF-1343 at 5 g a.i./ha with Agral 90 at 0.2%. The label claim for suppression of perennial sowthistle is acceptable with the addition of a label statement indicating that applications made at advanced leaf stages will reduce product effectiveness.

7.1.4.2 EF-1343 at 5 g a.i./ha + MCPA ester at 420 g a.i./ha

In addition to the data review described below, an additional review of a single year (1999) of bridging data was conducted to determine equivalency of a preformulated mixture of EF-1343 and MCPA ester with the proposed tank mixture to allow for consideration of data submitted by the applicant in support of the proposed tank mixture. The bridging data package consisted of a total of 29 field trials in which direct comparison of the preformulated mixture and tankmix was examined. The data demonstrated that the preformulated mixture and tankmix perform similarly with respect to efficacy. Consequently, the efficacy data submitted with the formulated mixture was evaluated in support of the application to register the tank mixture.

Volunteer canola
Seven trials conducted in 1997 examined control of volunteer canola with a treatment of the formulated mixture of EF-1343 and MCPA ester. Late season control averaged 100% control for volunteer canola, all varieties pooled. The label claim for control of volunteer canola with the tankmix of EF-1343 at 5 g a.i./ha with MCPA ester at 420 g a.i./ha is acceptable.

Control of glufosinate tolerant canola was examined in 3 trials conducted in 1998. Late season ratings averaged 99% control. The label claim for control of volunteer canola

including Liberty-Link canola with the tankmix of EF-1343 at 5 g a.i./ha with MCPA ester at 420 g a.i./ha is acceptable.

A total of 4 trials examined control of glyphosate tolerant canola with the formulated mixture of EF-1343 and MCPA ester. Late season ratings averaged 99% control for glyphosate tolerant canola. The label claim for control of Roundup Ready canola with the tankmix of EF-1343 at 5 g a.i./ha with MCPA ester at 420 g a.i./ha is acceptable.

Control of imazethapyr tolerant canola with the proposed tankmix was recorded in 8 trials. Late season ratings averaged 98% control for imazethapyr tolerant canola. The label claim for control of Smart canola with the tankmix of EF-1343 at 5 g a.i./ha with MCPA ester at 420 g a.i./ha is acceptable.

Common chickweed
Control of common chickweed was recorded in 13 trials conducted over 2 years. Late season control of common chickweed averaged 97% control. The label claim for control of common chickweed with the tankmix of EF-1343 at 5 g a.i./ha with MCPA ester at 420 g a.i./ha is acceptable.

Cleavers
Cleavers control was examined in a total of 18 trials conducted over 2 years. Late season control of cleavers averaged 98% control. The label claim for control of cleavers with the tankmix of EF-1343 at 5 g a.i./ha with MCPA ester at 420 g a.i./ha is acceptable.

Dandelion
Control of dandelion was recorded in a total of 14 trials conducted over 2 years. Late season control of seedling dandelion averaged 80% control with over half of the observations (8 out of a total of 13) providing control ratings between 60–80%. These results suggest that a claim of suppression of dandelion seedlings is more suitable than a claim of control. Late season control of dandelion rosettes averaged 65% control. The label claim for suppression of overwintered dandelion rosettes (less than 15 cm) with the tankmix of EF-1343 at 5 g a.i./ha with MCPA ester at 420 g a.i./ha is acceptable.

Flixweed
No data were summarized/submitted in support the request to label flixweed under the tankmix instructions. In addition, this weed species does not appear on the list of weeds controlled by an application of EF-1343 alone, or MCPA ester alone. Consequently, flixweed is not acceptable for labelling as controlled by the proposed tank mixture.

Hempnettle
Hempnettle control was summarized in a total of 9 trials conducted over 2 years. Late season ratings for control of hempnettle averaged 85% control. The label claim for control of hempnettle with the tankmix of EF-1343 at 5 g a.i./ha with MCPA ester at 420 g a.i./ha is acceptable.

Lamb's quarters
A total of 5 trials conducted over 2 years examined control of lamb's quarters with the formulated mixture of EF-1343 and MCPA ester. Late season control of lamb's quarters averaged 99% control (based on 11 observations). The label claim for control of lamb's quarters with the tankmix of EF-1343 at 5 g a.i./ha with MCPA ester at 420 g a.i./ha is acceptable.

Ball mustard
No data were summarized/submitted in support of the tankmix request for ball mustard, however, this species is listed for control on the MCPA ester label at a rate of 350 g a.i./ha suggesting that control should also be maintained by the proposed tank mixture. The label claim for control of ball mustard with the tankmix of EF-1343 at 5 g a.i./ha with MCPA ester at 420 g a.i./ha is acceptable.

Wild mustard
A total of 11 trials conducted over 2 years summarized control of wild mustard with the formulated mixture of EF-1343 and MCPA ester. Late season control of wild mustard averaged 99% control. The label claim for control of wild mustard with the tankmix of EF-1343 at 5 g a.i./ha with MCPA ester at 420 g a.i./ha is acceptable.

Redroot pigweed
Redroot pigweed control was examined in 16 trials over 2 years. Late season control of redroot pigweed averaged 93% control. The label claim for control of redroot pigweed with the tankmix of EF-1343 at 5 g a.i./ha with MCPA ester at 420 g a.i./ha is acceptable.

Common ragweed
No data for common ragweed were summarized/submitted in support of this tankmix request, however, common ragweed is listed for control on the MCPA ester label at a rate of 350 g a.i./ha suggesting that this species should also be controlled by the proposed tank mixture. Consequently, the label claim for control of common ragweed with the tankmix of EF-1343 at 5 g a.i./ha with MCPA ester at 420 g a.i./ha is acceptable.

Shepherd's purse
A total of 9 trials conducted over 2 years summarized control of shepherd's purse with the formulated mixture of EF-1343 and MCPA ester. Late season control of shepherd's purse averaged 99% control. The label claim for control of shepherd's purse with the tankmix of EF-1343 at 5 g a.i./ha with MCPA ester at 420 g a.i./ha is acceptable.

Smartweed
Smartweed control was reported in 14 trials from 2 years. Late season control of smartweed averaged 97% control. The label claim for control of smartweed with the tankmix of EF-1343 at 5 g a.i./ha with MCPA ester at 420 g a.i./ha is acceptable.

Stinkweed
Stinkweed control with the proposed tankmix was reported in 14 trials conducted over 2 years. Late season control of stinkweed averaged 98% control. The label claim for

control of stinkweed with the tankmix of EF-1343 at 5 g a.i./ha with MCPA ester at 420 g a.i./ha is acceptable.

Stork's bill

Control of stork's bill was summarized from a total of 10 trials over 2 years. Late season control of stork's bill averaged 86% with approximately a quarter of the observations (6 out of 26) providing control ratings less than 80%. These results suggest that a claim of suppression of stork's bill is acceptable due to the inconsistency of the control results.

Wild buckwheat

A total of 18 trials conducted over 2 years examined control of wild buckwheat with the formulated mixture of EF-1343 and MCPA ester. Late season control of wild buckwheat averaged 91% control. The label claim for control of wild buckwheat with the tankmix of EF-1343 at 5 g a.i./ha with MCPA ester at 420 g a.i./ha is acceptable.

Canada thistle

A claim of suppression of Canada thistle (top growth control) was supported by results from 19 trials conducted over 2 years. Late season control of Canada thistle averaged 70% control. The label claim for suppression of Canada thistle (top growth control) with the tankmix of EF-1343 at 5 g a.i./ha with MCPA ester at 420 g a.i./ha is acceptable.

Round-leaved mallow

Round-leaved mallow control was examined in 2 trials conducted in 1998, with 2 additional trials (also conducted in 1998) reporting control of mallow species with the proposed tank mixture. This weed does not appear on the florasulam label or the MCPA ester label for control by either product alone, and insufficient data were submitted on which to formulate a decision as to the level of control offered by the proposed tankmix. Consequently, this weed species is not acceptable for labelling at this time.

Annual sowthistle

A total of 6 trials conducted over 2 years examined control of annual sowthistle with the formulated mixture of EF-1343 and MCPA ester. Late season control of annual sowthistle averaged 87% control. The label claim for suppression of annual sowthistle with the tankmix of EF-1343 at 5 g a.i./ha with MCPA ester at 420 g a.i./ha is acceptable.

Perennial sowthistle

A total of 15 trials over 2 years examined control of perennial sowthistle with the formulated mixture of EF-1343 and MCPA ester. Late season control of perennial sowthistle averaged 79% control. The label claim for suppression of perennial sowthistle (top growth control) with the tankmix of EF-1343 at 5 g a.i./ha with MCPA ester at 420 g a.i./ha is acceptable.

7.1.4.3 EF-1343 at 5 g a.i./ha + Curtail M at 495 g a.i./ha

Canada thistle
Twenty-one trials conducted over 2 years reported control of Canada thistle with the proposed tankmix. Late season ratings averaged 86% control. The label claim for control of this species with the tankmix of EF-1343 at 5 g a.i./ha with Curtail M at 495 g a.i./ha is acceptable.

Volunteer canola
Control of volunteer canola, including glufosinate tolerant, glyphosate tolerant, and imazethapyr tolerant varieties, was reported in a total of 17 trials conducted over 2 years. Late season ratings averaged 99% control. The label claim for control of volunteer canola including Roundup Ready, Liberty Link, and Smart varieties with the tankmix of EF-1343 at 5 g a.i./ha with Curtail M at 495 g a.i./ha is acceptable.

Common chickweed
Control of common chickweed was summarized in 13 trials conducted over 2 years. Late season ratings averaged 97% control. The label claim for control of this species with the tankmix of EF-1343 at 5 g a.i./ha with Curtail M at 495 g a.i./ha is acceptable.

Cleavers
Control of cleavers was summarized in 18 trials over 2 years. Late season ratings averaged 98% control. The label claim for control of this species with the tankmix of EF-1343 at 5 g a.i./ha with Curtail M at 495 g a.i./ha is acceptable.

Smartweed
Control of smartweed was summarized from 14 trials conducted in 2 years. Late season ratings averaged 98% control for smartweed. The label claim for control of this species with the tankmix of EF-1343 at 5 g a.i./ha with Curtail M at 495 g a.i./ha is acceptable.

Stinkweed
Stinkweed control was examined in 14 trials over 2 years. Late season ratings averaged 99% control for stinkweed. The label claim for control of this species with the tankmix of EF-1343 at 5 g a.i./ha with Curtail M at 495 g a.i./ha is acceptable.

Wild buckwheat
Wild buckwheat control was examined in 18 trials conducted over 2 years. Late season ratings averaged 96% control. The label claim for control of this species with the tankmix of EF-1343 at 5 g a.i./ha with Curtail M at 495 g a.i./ha is acceptable.

Wild mustard
Wild mustard control was examined in 11 trials over 2 years. Late season ratings averaged 99% control. The label claim for control of this species with the tankmix of EF-1343 at 5 g a.i./ha with Curtail M at 495 g a.i./ha is acceptable.

Hempnettle
Hempnettle control was reported in 9 trials conducted over 2 years. Late season ratings averaged 88% control. The label claim for control of this species with the tankmix of EF-1343 at 5 g a.i./ha with Curtail M at 495 g a.i./ha is acceptable.

Lamb's quarters
Lamb's quarters control was summarized for a total of 7 trials over 2 years. Late season ratings averaged 96% control (based on 8 observations). The label claim for control of this species with the tankmix of EF-1343 at 5 g a.i./ha with Curtail M at 495 g a.i./ha is acceptable.

Shepherds' purse
Shepherd's purse control was reported in 9 trials over 2 years. Late season ratings averaged 99% control. The label claim for control of this species with the tankmix of EF-1343 at 5 g a.i./ha with Curtail M at 495 g a.i./ha is acceptable.

Redroot pigweed
Control of redroot pigweed was summarized for 14 trials conducted over 2 years. Late season ratings averaged 96% control (based on 16 observations) for redroot pigweed control. The label claim for control of this species with the tankmix of EF-1343 at 5 a.i./ha with Curtail M at 495 g a.i./ha is acceptable.

Annual sowthistle
Control of annual sowthistle was summarized for 6 trials over 2 years. Late season ratings averaged 97% control for annual sowthistle. The label claim for control of this species with the tankmix of EF-1343 at 5 g a.i./ha with Curtail M at 495 g a.i./ha is acceptable.

Perennial sowthistle
Control of perennial sowthistle was summarized for 16 trials from 2 years. Late season ratings averaged 89% control for perennial sowthistle with 4 of the observations providing less than commercially acceptable control (i.e., <80% control). As a result, the label claim for this species with the tankmix of EF-1343 at 5 g a.i./ha with Curtail M at 495 g a.i./ha is acceptable for suppression.

Dandelion
Control of dandelion was summarized from 18 trials conducted over 2 years. Late season ratings averaged 80% control for dandelion control, averaged over all stages of growth. The label claim for this species with the tankmix of EF-1343 at 5 g a.i./ha with Curtail M at 495 g a.i./ha is modified to indicate suppression of dandelion (seedling, and overwintered rosettes).

Stork's bill
Control of stork's bill was reported for 10 trials conducted over 2 years. Late season ratings averaged 90% control. The label claim for control of this species with the tankmix of EF-1343 at 5 g a.i./ha with Curtail M at 495 g a.i./ha is acceptable.

Round-leaved mallow

Control of mallow species was summarized for 6 trials. Late season ratings averaged 85% control for a combination of results on *Malva pusilla* and *Malva neglecta*, with 2 of these observations indicating less than commercially acceptable control. The variability in results combined with the lack of species specific data does not support labelling of common mallow.

Ball mustard

No data were summarized/submitted in support of the request to label ball mustard for control by the proposed tankmix. In addition, this weed does not appear on the list of weeds controlled by an application of EF-1343 alone, or Curtail M alone. Consequently, ball mustard is not acceptable for labelling as controlled by the proposed tankmix.

Flixweed

No data for flixweed were summarized/submitted in support of this tankmix request, however, flixweed is listed for control on the Curtail M label at the appropriate rate suggesting that this species should also be controlled by the proposed tank mixture. Consequently, the label claim for control of flixweed with the tankmix of EF-1343 at 5 g a.i./ha with Curtail M at 495 g a.i./ha is acceptable.

7.1.4.4 EF-1343 + MCPA ester + Assert 300 SC

Wild oats

A total of 17 trials conducted over 2 years were summarized examining efficacy with the tank mixture of EF-1343 and MCPA ester + Assert 300 SC. Wild oat control with the tankmix treatment of EF-1343 at 5 g a.i./ha with MCPA ester at 420 g a.i./ha and Assert at 500 g a.i./ha (with Acidulate at 0.25% w/w) provided control of wild oats comparable to an application of Assert at 500 g a.i./ha (with Acidulate at 0.25% w/w) alone with late season control ratings of 97% and 92%, respectively. Broadleaf weed control was not affected by the tankmix.

7.1.4.5 EF-1343 + MCPA ester + Horizon (56 g a.i./ha, 70 g a.i./ha)

A total of 28 trials conducted over 3 years were summarized examining efficacy with the tank mixture of EF-1343 and MCPA ester + Horizon at 56 and 70 g a.i./ha (with Score at 0.8 and 1.0% v/v, respectively).

Wild oats

A total of 18 trials conducted over 2 years summarized control of wild oats with the proposed tankmix (Horizon at 56 g a.i./ha). Wild oats control with the tankmix treatment of EF-1343 at 5 g a.i./ha with MCPA ester at 420 g a.i./ha and Horizon at 56 g a.i./ha (Score at 0.8% v/v) provided control comparable to an application of Horizon at 56 g a.i./ha (Score at 0.8% v/v) alone with late season control ratings of 97% and 92%, respectively. Broadleaf weed control was not affected by the tankmix.

Green foxtail
A total of 13 trials conducted over 3 years summarized control of green foxtail with the proposed tankmix (Horizon at 72 g a.i./ha). Green foxtail control with the tankmix treatment of EF-1343 at 5 g a.i./ha with MCPA ester at 420 g a.i./ha and Horizon at 72 g a.i./ha (Score at 1.0% v/v) provided control comparable to an application of Horizon at 72 g a.i./ha (Score at 1.0% v/v) alone with late season ratings of 90% and 95%, respectively. Broadleaf weed control was not affected by the tankmix.

7.1.4.6 EF-1343 + MCPA ester + Puma Super

Wild oats
A total of 20 trials conducted over 2 years summarized control of wild oats with the proposed tankmix. Wild oat control with the tankmix treatment of EF-1343 at 5 g a.i./ha with MCPA ester at 420 g a.i./ha and Puma Super at 92 g a.i./ha provided control comparable to an application of Puma Super at 92 g a.i./ha alone with late season control ratings of 94% and 97%, respectively. Broadleaf weed control was not affected by the tankmix.

7.1.4.7 EF-1343 + Curtail M + Assert 300 SC

Wild oats
A total of 16 trials conducted over 2 years examined control of wild oats with the proposed tankmix. Wild oat control with the tankmix treatment of EF-1343 at 5 g a.i./ha with Curtail M at 495 g a.i./ha and Assert at 500 g a.i./ha (with Acidulate at 0.25% w/w) was comparable to an application of Assert at 500 g a.i./ha (with Acidulate at 0.25% w/w) alone with late season control ratings of 93% and 92%, respectively. Broadleaf weed control was not adversely affected by the tankmix.

7.1.4.8 EF-1343 + Curtail M + Horizon (56 g a.i./ha, 70 g a.i./ha)

The applicant summarized a total of 20 trials conducted over 2 years. The majority of treatments were applied at the 1- to 4-leaf stage of wild oats, with a few trials at 2 tillers stage. Of the 20 trials conducted, 18 of the trials included Horizon at 56 g a.i./ha, and 11 of the trials included Horizon at 72 g a.i./ha.

Wild oats
Wild oat control with the tankmix treatment of EF-1343 at 5 g a.i./ha with Curtail M at 495 g a.i./ha and Horizon at 56 g a.i./ha (Score at 0.8% v/v) was comparable to an application of Horizon at 56 g a.i./ha alone with late season control ratings of 95 and 98%, respectively. Broadleaf weed control was not adversely affected by the tankmix.

Green foxtail
The applicant summarized a total of 15 trials conducted over 3 years. The majority of treatments were applied at the 2- to 5-leaf stage of green foxtail. Green foxtail control with the tankmix treatment of EF-1343 at 5 g a.i./ha with Curtail M at 495 g a.i./ha and Horizon at 70 g a.i./ha (Score at 1.0% v/v) was comparable to an application of Horizon

at 70 g a.i./ha alone with late season control ratings of 91 and 95%, respectively. Broadleaf weed control was not adversely affected by the tankmix.

7.1.4.9 EF-1343 + Curtail M + Puma Super

Wild oats

The applicant summarized a total of 18 trials conducted over 2 years. The majority of treatments were applied at the 1- to 4-leaf stage of wild oats, with a few trials at the 2 tillers stage. Wild oat control with the tankmix treatment of EF-1343 at 5 g a.i./ha with Curtail M at 495 g a.i./ha and Puma Super at 92 g a.i./ha provided control comparable to an application of Puma Super at 92 g a.i./ha alone with late season control ratings of 93 and 98%, respectively. Broadleaf weed control was not adversely affected by the tankmix.

7.1.5 Total spray volume

The applicant applied for spray volume directions of 50 to 100 L/ha for EF-1343 applied alone, and in tank mixture with MCPA ester or Curtail M. Water volume for the 3-way tankmix combinations is 100 L/ha. The data submitted in support of the application to register EF-1343 applied alone did not examine spray volumes of 50 L/ha. Data in support of the tank mixtures with either MCPA ester or Curtail M did include treatments applied at 50 L/ha, however the data were not summarized adequately to allow for a review of efficacy and crop tolerance of the 50 L/ha spray volume. As a result, the label directions must be modified to instruct a minimum spray volume of 100 L/ha.

7.2 Phytotoxicity to target plants (including different cultivars), or to target plant products

7.2.1 EF-1343 at 5 g a.i./ha + Agral 90 at 0.2% v/v

Crop tolerance for spring wheat, durum wheat and spring barley was assessed in both weed-free crop tolerance trials and efficacy trials. Crop phytotoxicity was assessed in the weed-free trials by recording visual tolerance parameters including: chlorosis% visual, injury% visual, height% visual reduction, delay maturity days% visual, visual injury, etc. A single quantitative measure of crop yield was taken at the end of the growing season. Both weed-free trials and efficacy trials were reported for all three crops and were conducted over 2 years.

Spring wheat

A total of 10 weed-free trials reported crop tolerance on spring wheat (including Canadian Prairie Spring [CPS] and Hard Red Spring [HRS]). All trials were conducted in 1997. Spring wheat varieties tested in the weed-free trials included: AC Taber, CDC Teal, Katepwa, AC Barrie, and AC Karma. A total of 93 efficacy trials reported crop tolerance ratings on spring wheat. Little to no visual injury was observed in either the weed-free crop tolerance trials or the efficacy trials. Yield values were comparable to

the weed-free check treatment for both the × (5 g a.i./ha) and 2× (10 g a.i./ha) rates, 106 and 104%, respectively.

Spring barley

A total of 23 weed-free trials conducted over 2 years reported crop tolerance on spring barley (including 2-row, 6-row and hulless). Spring barley varieties tested in the weed-free trials included: Manley, Lacombe, Oxbow, Bedford, Harrington, B1602, Buck, Falcon, Condor, CDC Dawn and CDC Silky. A total of 23 efficacy trials reported crop tolerance ratings on spring barley. Little to no visual injury was observed in either the weed-free crop tolerance trials or the efficacy trials. Yield values were comparable to the weed-free check treatment for both the × (5 g a.i./ha) and 2× (10 g a.i./ha) rates, 103% and 104%, respectively.

Durum wheat

A total of 23 weed-free trials (conducted over 2 years) reported crop tolerance on durum wheat. Durum wheat varieties tested in the weed-free trials included: Kyle, Sceptre and Plenty. A total of 7 efficacy trials reported crop tolerance ratings on durum wheat. Little to no visual injury was observed in either the weed-free crop tolerance trials or the efficacy trials. Yield values were comparable to the weed-free check treatment for both the × (5 g a.i./ha) and 2× (10 g a.i./ha) rates, 104 and 106%, respectively.

The data submitted support the application of EF-1343 at 5 g a.i./ha with Agral 90 at 0.5% v/v on spring wheat, durum wheat, and spring barley, in a minimum spray volume of 100 L/ha applied at the 2- to 6-leaf stage of the crop.

7.2.2 EF-1343 at 5 g a.i./ha + MCPA ester at 420 g a.i./ha

In addition to the data review described below, an additional review of a single year (1999) of bridging data was conducted to determine equivalency of a preformulated mixture of EF-1343 and MCPA ester with the proposed tank mixture to allow for consideration of data submitted by the applicant in support of the proposed tank mixture. The bridging data package consisted of 19 trials on spring wheat, 5 trials on durum wheat and 5 trials on spring barley. The data demonstrated that the preformulated mixture and tankmix perform similarly with respect to crop tolerance. Consequently, the tolerance data submitted with the formulated mixture was evaluated in support of the application to register the tank mixture.

Crop tolerance for spring wheat, durum wheat, spring barley and oats was assessed in weed-free crop tolerance trials. Spring wheat and spring barley tolerance was also assessed in efficacy trials. Crop phytotoxicity was assessed in the weed-free trials by recording visual tolerance parameters including: chlorosis% visual, injury% visual, height% visual reduction, delay maturity days% visual, visual injury, etc. A single quantitative measure of crop yield was taken at the end of the growing season. Both weed-free trials and efficacy trials were conducted over two years.

Spring wheat
A total of 11 weed-free crop tolerance trials were summarized with a treatment of EF-1343 and MCPA ester at the proposed rate of 425 g a.i./ha. All trials were conducted in 1997. Both CPS and HRS varieties including AC Taber, AC Barrie, AC Karma, Teal and Katepwa were tested. In addition, 62 efficacy trials reported visual estimates of crop tolerance on spring wheat. Little to no visual injury was observed in either the weed-free crop tolerance trials or the efficacy trials. Yield values were comparable to the weed-free check treatment for both the × (5 g a.i./ha florasulam + 420 g a.i./ha MCPA ester) and 2× (10 g a.i./ha florasulam + 840 g a.i./ha MCPA ester) rates, 106 and 105%, respectively.

Durum wheat
A total of 23 weed-free crop tolerance trials conducted over 2 years were summarized with a treatment of EF-1343 and MCPA ester at the proposed rate of 425 g a.i./ha. Varieties included Sceptre, Kyle and Plenty. Little to no visual injury was observed in the weed-free crop tolerance trials. Yield values were comparable to the weed-free check treatment for both the × and 2× rates, 105 and 103%, respectively.

Spring barley
A total of 25 weed-free crop tolerance trials conducted over 2 years were summarized with a treatment of EF-1343 and MCPA ester at the proposed rate of 425 g a.i./ha. Barley varieties tested included 2-row, 6-row and hulless, specifically, AC Lacombe, Manley, Buck, Oxbow, Harrington, B-1602, CDC Silky, Bedford, Falcon and CDC Dawn. In addition, 21 efficacy trials reported visual estimates of crop tolerance on spring barley. Little to no visual injury was observed in either the weed-free crop tolerance trials or the efficacy trials. Yield values were comparable to the weed-free check treatment for both the × and 2× rates, 102 and 99%, respectively.

Oats
A total of 23 weed-free crop tolerance trials conducted over 2 years were summarized with a treatment of EF-1343 and MCPA ester at the proposed rate of 425 g a.i./ha. Varieties tested include: Boyer, Robert, Calibre and Riel. Little to no visual injury was observed in the weed-free crop tolerance trials. Yield values were comparable to the weed-free check treatment for both the × and 2× rates, 96 and 96%, respectively.

The data submitted for the tankmix of EF-1343 at 5 g a.i./ha tank mixed with MCPA ester at 420 g a.i./ha suggest that adequate crop tolerance is observed when application is made to spring wheat, durum wheat, spring barley and oats in a minimum spray volume of 100 L/ha applied at the 2- to 6-leaf stage of the crop.

7.2.3 EF-1343 at 5 g a.i./ha + Curtail M at 495 g a.i./ha

Spring wheat
A total of 11 weed-free crop tolerance trials were summarized with a treatment of EF-1343 + Curtail M at the proposed rate of 5 g a.i./ha + 495 g a.i./ha. All trials were conducted in a single year (1997). All trials also reported crop tolerance at 2× rate. Spring

wheat varieties included in the trials are: AC Taber, Teal, Katepwa, AC Barrie and AC Karma. In addition, 45 efficacy trials were summarized. Spring wheat varieties included in the trials are: AC Taber, Teal, Katepwa, AC Barrie, AC Karma, Roblin, Oslo, Biggar, Majestic, Domain, Pioneer and Makwan. Little to no visual injury was observed in either the weed-free crop tolerance trials or the efficacy trials. Yield values were comparable to the weed-free check treatment for both the × (5 g a.i./ha EF-1343 + 495 g a.i./ha Curtail M) and 2× (10 g a.i./ha EF-1343 + 990 g a.i./ha Curtail M) rates, 104 and 105%, respectively.

Durum wheat

A total of 23 weed-free crop tolerance trials conducted over 2 years were summarized with a treatment of EF-1343 + Curtail M at the proposed rate of 5 g a.i./ha + 495 g a.i./ha. All trials also reported crop tolerance at 2× rate. Durum wheat varieties included in the trials are Kyle and Sceptre. In addition, two efficacy trials were summarized. Little to no visual injury was observed in either the weed-free crop tolerance trials or the efficacy trials. Yield values were comparable to the weed-free check treatment for both the × and 2× rates, 106 and 100%, respectively.

Spring barley

A total of 23 weed-free crop tolerance trials conducted over 2 years were summarized with a treatment of EF-1343 + Curtail M at the proposed rate of 5 g a.i./ha + 495 g a.i./ha. All trials also reported crop tolerance at 2× rate. Spring barley varieties included in the trials are: Falcon, Manley, AC Lacombe, Bedford, Condor, Buck, Harrington, B1602, CDC Silky, Oxbow and CDC Down. In addition, 16 efficacy trials were summarized. Little to no visual injury was observed in either the weed-free crop tolerance trials or the efficacy trials. Yield values were comparable to the weed-free check treatment for both the × and 2× rates, 101 and 100%, respectively.

Oats

A total of 23 weed-free crop tolerance trials conducted over 2 years were summarized with a treatment of EF-1343 + Curtail M at the proposed rate of 5 g a.i./ha + 495 g a.i./ha. Oat varieties included in the trials are: Boyer, Calibre, Robert and Riel. Visual estimates of crop injury at the early rating (≤21 DAT) indicate that slight damage may occur (up to 10% visual estimate), however, this appeared to have been outgrown by the later rating time (>21 DAT). Yield values were comparable to the weed-free check treatment for both the × and 2× rates, 98 and 100%, respectively.

7.2.4 EF-1343 + MCPA ester + Assert 300 SC

Spring wheat

A total of 7 weed-free crop tolerance trials were summarized with a treatment of EF-1343 + MCPA ester + Assert 300 SC at the proposed rate of 5 g a.i./ha + 420 g a.i./ha + 500 g a.i./ha. All trials were conducted in a single year (1997). Efficacy trials were summarized reporting crop tolerance ratings. Little to no visual injury was observed in either the weed-free crop tolerance trials or the efficacy trials. Yield values averaged 123% of the weed-free check treatment.

Durum wheat
A total of 8 weed-free crop tolerance trials conducted over 2 years were summarized with a treatment of EF-1343 + MCPA ester + Assert 300 SC at the proposed rate of 5 g a.i./ha + 420 g a.i./ha + 500 g a.i./ha. Efficacy trials were also summarized reporting crop tolerance ratings. Little to no visual injury was observed in either the weed-free crop tolerance trials or the efficacy trials. Yield values averaged 120% of the weed-free check treatment.

Spring barley
A total of 8 weed-free crop tolerance trials conducted over 2 years were summarized with a treatment of EF-1343 + MCPA ester + Assert 300 SC at the proposed rate of 5 g a.i./ha + 420 g a.i./ha + 500 g a.i./ha. Efficacy trials were also summarized reporting crop tolerance ratings. Little to no visual injury was observed in either the weed-free crop tolerance trials or the efficacy trials. Yield values averaged 108% of the weed-free check treatment.

7.2.5 EF-1343 + MCPA ester + Horizon

Spring wheat
A total of 5 weed-free crop tolerance trials (1997 only) were summarized with a treatment of EF-1343 + MCPA ester + Horizon at the proposed rate of 5 g a.i./ha + 420 g a.i./ha + 70 g a.i./ha with Score at 1.0% v/v. Efficacy trials were also summarized reporting crop tolerance ratings. Little to no visual injury was observed in either the weed-free crop tolerance trials or the efficacy trials. Yield values averaged 128% of the weed-free check treatment.

Durum wheat
A total of 8 weed-free crop tolerance trials conducted over 2 years were summarized with a treatment of EF-1343 + MCPA ester + Horizon at the proposed rate of 5 g a.i./ha + 420 g a.i./ha + 70 g a.i./ha with Score at 1.0% v/v. Little to no visual injury was observed in the weed-free crop tolerance trials with yield values averaging 126% of the weed-free check treatment.

7.2.6 EF-1343 + MCPA ester + Puma Super

Spring wheat
A total of 5 weed-free crop tolerance trials (1997 only) were summarized with a treatment of EF-1343 + MCPA ester + Puma Super at the proposed rate of 5 g a.i./ha + 420 g a.i./ha + 92 g a.i./ha. Efficacy trials were also summarized reporting crop tolerance ratings. Little to no visual injury was observed in either the weed-free crop tolerance trials or the efficacy trials. Yield values averaged 124% of the weed-free check treatment.

Durum wheat
A total of 8 weed-free crop tolerance trials conducted over 2 years were summarized with a treatment of EF-1343 + MCPA ester + Puma Super at the proposed rate of 5 g a.i./ha +

420 g a.i./ha + 92 g a.i./ha. Little to no visual injury was observed in the weed-free crop tolerance trials with yield values averaging 126% of the weed-free check treatment.

Spring barley
A total of 8 weed-free crop tolerance trials conducted over 2 years were summarized with a treatment of EF-1343 + MCPA ester + Puma Super at the proposed rate of 5 g a.i./ha + 420 g a.i./ha + 92 g a.i./ha. Efficacy trials were also summarized reporting crop tolerance ratings. Little to no visual injury was observed in either the weed-free crop tolerance trials or the efficacy trials. Yield values averaged 108% of the weed-free check treatment.

The data submitted in support of the following tank mixtures: EF-1343 + MCPA ester + Assert 300 SC; EF-1343 + MCPA ester + Horizon; EF-1343 + MCPA ester + Puma Super, suggest that adequate crop tolerance is observed when application is made to spring wheat, durum wheat and spring barley in a minimum spray volume of 100 L/ha at the 2- to 6-leaf stage of the crop.

7.2.7 EF-1343 + Curtail M + Assert 300 SC

Spring wheat
A total of 5 weed-free crop tolerance trials (1997) were summarized with a treatment of EF-1343 + Curtail M + Assert 300 SC at the proposed rate of 5 g a.i./ha + 495 g a.i./ha + 500 g a.i./ha. In addition 11 efficacy trials were summarized reporting crop tolerance ratings. Little to no visual injury was observed in either the weed-free crop tolerance trials or the efficacy trials. Yield values averaged 121% of the weed-free check treatment.

Durum wheat
A total of 8 weed-free crop tolerance trials conducted over 2 years were summarized with a treatment of EF-1343 + Curtail M + Assert 300 SC at the proposed rate of 5 g a.i./ha + 495 g a.i./ha + 500 g a.i./ha. In addition, 2 efficacy trials were summarized reporting crop tolerance ratings. Little to no visual injury was observed in either the weed-free crop tolerance trials or the efficacy trials. Yield values averaged 123% of the weed-free check treatment.

Spring barley
A total of 8 weed-free crop tolerance trials conducted over 2 years were summarized with a treatment of EF-1343 + Curtail M + Assert 300 SC at the proposed rate of 5 g a.i./ha + 495 g a.i./ha + 500 g a.i./ha. In addition, 4 efficacy trials were summarized reporting crop tolerance ratings. Little to no visual injury was observed in either the weed-free crop tolerance trials or the efficacy trials. Yield values averaged 111% of the weed-free check treatment.

7.2.8 EF-1343 + Curtail M + Horizon

Spring wheat
A total of 5 weed-free crop tolerance trials (1997 only) were summarized with a treatment of EF-1343 + Curtail M + Horizon at the proposed rate of 5 g a.i./ha + 495 g a.i./ha +

70 g a.i./ha with Score at 1.0% v/v. In addition, 12 efficacy trials were summarized reporting crop tolerance ratings. Little to no visual injury was observed in either the weed-free crop tolerance trials or the efficacy trials. Yield values averaged 124% of the weed-free check treatment.

Durum wheat
A total of 8 weed-free crop tolerance trials conducted over 2 years were summarized with a treatment of EF-1343 + Curtail M + Horizon at the proposed rate of 5 g a.i./ha + 495 g a.i./ha + 70 g a.i./ha with Score at 1.0% v/v. Little to no visual injury was observed in the weed-free crop tolerance trials with yield values averaging 121% of the weed-free check treatment.

7.2.9 EF-1343 + Curtail M + Puma Super

Spring wheat
A total of 5 weed-free crop tolerance trials (1997 only) were summarized with a treatment of EF-1343 + Curtail M + Puma Super at the proposed rate of 5 g a.i./ha + 495 g a.i./ha + 92 g a.i./ha. In addition, 14 efficacy trials were summarized reporting crop tolerance ratings. Little to no visual injury was observed in either the weed-free crop tolerance trials or the efficacy trials. Yield values averaged 123% of the weed-free check treatment.

Durum wheat
A total of 8 weed-free crop tolerance trials conducted over 2 years were summarized with a treatment of EF-1343 + Curtail M + Puma Super at the proposed rate of 5 g a.i./ha + 495 g a.i./ha + 92 g a.i./ha. Little to no visual injury was observed in the weed-free crop tolerance trials with yield values averaging 122% of the weed-free check treatment.

Spring barley
A total of 8 weed-free crop tolerance trials conducted over 2 years were summarized with a treatment of EF-1343 + Curtail M + Puma Super at the proposed rate of 5 g a.i./ha + 495 g a.i./ha + 92 g a.i./ha. In addition, 4 efficacy trials were summarized reporting crop tolerance ratings. Little to no visual injury was observed in either the weed-free crop tolerance trials or the efficacy trials. Yield values averaged 109% of the weed-free check treatment.

The data submitted in support of the following tank mixtures: EF-1343 + Curtail M; EF-1343 + Curtail M + Assert 300 SC; EF-1343 + Curtail M + Horizon; EF-1343 + Curtail M + Puma Super, suggest that adequate crop tolerance is observed when application is made to spring wheat, durum wheat, spring barley or oats (Curtail tankmix only) in a minimum spray volume of 100 L/ha at the 2- to 6-leaf stage of the crop.

7.3 Observations on undesirable or unintended side effects, e.g., on beneficial and other non-target organisms, on succeeding crops, other plants or parts of treated plants used for propagating purposes (e.g., seed, cutting, runners)

7.3.1 Impact on succeeding crops

The proposed crop rotation instructions for EF-1343 Suspension Concentrate Herbicide allow for seeding the following year to barley, canola, forage grasses, oats, peas, rye or wheat, or fields can be summer fallowed. Six field trials were conducted in support of the proposed recrop instructions, with a breakdown over time as follows: 2 trials in 1996 and 4 trials in 1997. Trials were conducted in the provinces of Alberta (2 trials), Saskatchewan (2 trials) and Manitoba (2 trials) and examined rates of × and 2×. Only canola and peas were examined in the field trials with scientific rationales and plant back data provided for wheat, barley and other monocot crops.

In the 5 trials examining recrop effects on canola, the crop was planted at 10–11 months following the application of EF-1343 alone or in tank mixture. Parameters measured included visual % injury, delay in maturity, growth inhibition, stand reduction and crop yield (reported in 3 trials). Yield was consistently above the untreated check.

Peas were planted at 10–11 months following an application of EF-1343 alone or in tank mixture, in a total of 5 trials with 4 trials reporting yield. In addition to yield, parameters assessed included visual % injury, delay in maturity, growth inhibition and stand reduction. Yield values were consistently equal to or greater than the untreated check treatment for EF-1343 at the × and 2× rates.

The rationale provided for inclusion of wheat and barley in the crop rotation studies is acceptable, along with the plant back data provided.

The information provided for oats, rye and forage grasses as rotational crops is not acceptable.

7.3.2 Impact on adjacent crops

The applicant has included the following label statements under the General Use Precautions section of the EF-1343 Suspension Concentrate Herbicide label:

> "Do not apply EF-1343 directly to, or otherwise permit it to come in direct contact with susceptible crops or desirable plants including alfalfa, edible beans, canola, flowers and ornamental, lentils, lettuce, peas, potatoes, radishes, soybeans, sugar beets, sunflowers, tomatoes or tobacco."
>
> "Do not apply where proximity of susceptible crops (e.g., canola and legumes) or other desirable plants is likely to result in exposure to spray or spray drift."

The proposed label statements should adequately address concerns regarding impact on adjacent crops.

7.4 Economics

The applicant did not address this section in the data submission.

7.5 Sustainability

7.5.1 Survey of alternatives

See Table 3, Appendix IV.

7.5.2 Contribution to risk reduction

The applicant did not address this section in the data submission.

7.5.3 Information on the occurrence or possible occurrence of the development of resistance

In the interest of resistance management, the EF-1343 Suspension Concentrate Herbicide label will be modified to include the following statements, as outlined in DIR99-06, *Voluntary Pesticide Resistance-Management Labelling Based on Target Site/Mode of Action*.

Resistance management recommendations
For resistance management, EF-1343 is a Group 2 herbicide. Any weed population may contain or develop plants naturally resistant to EF-1343 and other Group 2 herbicides. The resistant biotypes may dominate the weed population if these herbicides are used repeatedly in the same field. Other resistance mechanisms that are not linked to site of action, but specific for individual chemicals, such as enhanced metabolism, may also exist. Appropriate resistance management strategies should be followed.

To delay herbicide resistance:

- Where possible, rotate the use of EF-1343 or other Group 2 herbicides with different herbicide groups that control the same weeds in a field.
- Use tank mixtures with herbicides from a different group when such use is permitted.
- Herbicide use should be based on an integrated pest management program that includes scouting, historical information related to herbicide use and crop rotation, and considers tillage (or other mechanical), cultural, biological and other chemical control practices.

- Monitor treated weed populations for resistance development.
- Prevent movement of resistant weed seeds to other fields by cleaning harvesting and tillage equipment and planting clean seed.
- Contact your local extension specialist or certified crop advisors for any additional pesticide resistance management and integrated weed management recommendations for specific crops and weed biotypes.
- For further information or to report suspected resistance, contact Dow AgroSciences at 1-800-667-3852.

7.6 Conclusions

Adequate efficacy and crop tolerance data has been provided to support application of EF-1343 Suspension Concentrate Herbicide on spring wheat, including durum, and spring barley alone and in proposed tank mixtures. Efficacy and crop tolerance is acceptable for application of EF-1343 on oats in tank mixtures as appropriate. Data submitted support application once per season to cereals at the 2- to 6-leaf stage in a minimum water volume of 100 L/ha. Recropping data submitted for review support planting of barley, canola, peas or wheat the year following application of EF-1343 (or field can be summer fallowed). Data was not submitted to support a rainfast statement indicating that EF-1343 is rainfast 1 h after application; as a result, this statement is not acceptable.

Tank mixtures for which adequate efficacy and crop tolerance were demonstrated include: EF-1343 + MCPA ester; EF-1343 + Curtail M Herbicide; EF-1343 + MCPA ester + Assert 300 SC; EF-1343 + MCPA ester + Horizon Herbicide; EF-1343 + MCPA ester + Puma Super Herbicide; EF-1343 + Curtail M + Assert 300 SC; EF-1343 + Curtail M + Horizon Herbicide; EF-1343 + Curtail M + Puma Super Herbicide.

8.0 Toxic Substances Management Policy considerations

During the review of florasulam, the PMRA has taken into account the federal Toxic Substances Management Policy and has followed DIR99-03. It has been determined that this product does not meet TSMP Track-1 criteria.

8.1 Active ingredient

Florasulam does not meet the TSMP Track-1 criteria for persistence. The values for half-life in water and sediment (3–18 days) and soil (0.7–8.3 days) are below the TSMP Track-1 cut-off criteria for water (≥182 days), soil (≥182 days) and sediment (≥365 days). Because it is relatively non-volatile, a phototransformation study in air was not triggered. Florasulam is not bioaccumulative. Studies have shown that the octanol–water partition coefficient (log K_{ow}) is 1.00, –1.22 and –2.06 for pH 4, 7 and 10, respectively, which is below the TSMP Track-1 cut-off criterion of ≥5.0. A

bioconcentration study in fish was not triggered. Mammalian toxicology studies indicated a low potential for accumulation. The toxicity of florasulam is described in Chapters 3 and 6 and Appendices I and III (Tables 8 and 9).

8.2 Transformation products

5-Hydroxy-XDE-570 is the primary transformation product in laboratory fate studies and it is the only major transformation product in the field. This transformation product does not meet the TSMP Track-1 criteria because it does not bioaccumulate.

8.3 Formulants

All formulants in the three formulated products, EF-1343 Manufacturing Concentrate, EF-1343 Suspension Concentrate Herbicide and EF-1440 Manufacturing Concentrate, are either EPA list 3 or 4, except for an antifoam compound, polydimethyl siloxane, which is not included in the lists. The concentration of this formulant ranges from 0.02 to 0.18% by weight. No known EPA list 1 or 2 formulants are contained in these formulations.

8.4 By-products or microcontaminants

The formulated products do not contain any by-products or microcontaminants that are known to be TSMP Track-1 substances. Impurities of toxicological concern are not expected to be present in the raw materials nor are they expected to be generated during the manufacturing process.

9.0 Regulatory decision with additional data requirements

Florasulam Technical and the manufacturing end-use products, EF-1440 Manufacturing Concentrate and EF-1343 Manufacturing Concentrate, and the end-use product, EF-1343 Suspension Concentrate Herbicide have been granted temporary registrations for use on spring wheat, including durum, spring barley and oats (in tankmix only) with the following MRLs: wheat (0.01 ppm), barley (0.01 ppm) and oats (0.01 ppm), pursuant to Section 17 of the Pest Control Products (PCP) Regulations, subject to the following conditions:

- submission of batch data analysis for technical florasulam; and
- submission of additional crop residue studies.

List of abbreviations

ADI	acceptable daily intake
a.i.	active ingredient
ALAT	alanine aminotransferase
ALP	alkaline phosphatase
ARfD	acute reference dose
BBCH	BASF, Bayer, Ciba-Geigy and Hoechst
bw	body weight
bwg	body-weight gain
CAS	Chemical Abstracts Society
CD	caesarian derived
C_{max}	maximum plasma concentration
$C_{½max}$	one-half maximum plasma concentration
CPS	Canadian Prairie Spring
CSFII	Continuing Survey of Food Intake by Individuals
d	day(s)
DAT	days after treatment
DT_{50}	time required for non first-order 50% dissipation
DT_{90}	time required for non first-order 90% dissipation
dw	dry weight of diet
E. coli	*Escherichia coli*
EC_{25}	concentration effective against 25% of test organisms
EC_{50}	median effective concentration
EEC	expected environmental concentration
F_1	1st generation offspring
F_2	2nd generation offspring
fw	fresh weight
GAP	good agricultural practice
GC	gas chromatography
GIT	gastrointestinal tract
GSD	geometric standard deviation
H	Henry's Law constant
HCT	hematocrit
HD	high dose
HDT	highest dose tested
HGB	hemoglobin
HGPRT	hypoxanthine guanine phosphoribosyl transferase
HPLC	high performance liquid chromatography
HRS	Hard Red Spring
ILV	interlaboratory validation
K_d	Freundlich adsorption coefficient
K_{oc}	organic carbon adsorption coefficient
K_{ow}	*n*-octanol–water partition coefficient
LC_{50}	lethal concentration 50%
LD_{50}	lethal dose 50%
LD	low dose

LOAEL	lowest observed adverse effect level
LOD	limit of detection
LOQ	limit of quantitation
MIS	maximum irritation score
MAS	maximum average score (for 24, 48 and 72 h)
MOE	margin of exposure
MOS	margin of safety
MRL	maximum residue limit
MS	mass spectrometry
MSD	mass selection detection
NOAEL	no observed adverse effect level
NOEC	no observable effect concentration
NOEL	no observable effect dose level
NZW	New Zealand white
P_1	1st generation parental animals
P_2	2nd generation parental animals
PCP	pest control products
pH	$-\log_{10}$ hydrogen ion concentration
PHED	Pesticide Handlers Exposure Database
PHI	preharvest interval
pK_a	acid dissociation constant
PPE	personal protective equipment
ppm	parts per million
RAC	raw agricultural commodity
RBC	red blood cells
RSD	relative standard deviation
SD	standard deviation
SG	specific gravity
$t_{½}$	first-order half-life
μg	microgram
μL	microlitre
U.S. EPA	United States Environmental Protection Agency

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Appendix I Toxicology summary tables

Summary of toxicity studies with florasulam

NOTE: Hypertrophy of the epithelial cells of the collecting ducts was observed in all species tested. With the exception of elevated serum bicarbonate levels in the high-dose (HD) males in the 2-year rat dietary study, there were no toxicologically relevant clinical chemistry findings (serum creatinine, nitrogen or electrolyte levels) to correlate with urinalysis findings in the rat or with hypertrophy of the epithelial cells in the mouse, rat and dog or to indicate an impairment of renal function in any species tested. There was no significant increased incidence of cellular degeneration or necrosis evident in the kidneys in any species tested. Renal function did not appear to be compromised in any species tested and continued ingestion of the test substance did not result in significant deterioration of renal function nor in renal tumours. In mice, the severity of the hypertrophy increased from very slight following 90 d to slight following 12 and 24 months of exposure. In rats, it appeared to become more pronounced over time from 3 to 12 to 24 months. In dogs, the severity (slight) did not appear to increase with prolonged exposure.

RAT: METABOLISM: ^{14}C-XR-570 uniformly labeled in the aniline ring (both sexes) or labeled at the 9 position on the triazolo-pyrimidine ring (males only)

Absorption: Following single or repeat oral low-dose (LD) or single oral HD administration, ^{14}C-XR-570 was extensively and rapidly absorbed in both sexes. Peak plasma concentrations (C_{max}) were achieved within 0.5–1 h following single LD and HD administration. Estimated proportion of administered dose absorbed was ~90–93% following single or repeat LD administration and ~82–86% following single HD administration. Bile absorption accounted for 1% of the administered dose by 24 h. Data suggest a saturation of absorption and saturable renal excretion at the HD and more rapid and efficient removal at the LD.
Distribution: Highest residues levels were observed in skin and carcass; however, mean recovery of radioactivity in tissues and carcass at sacrifice (at 168 h post-dosing) was less than 0.6% of administered dose for all dose groups indicating little potential for accumulation. The apparent volume of distribution was increased at the HD, which may suggest increased binding to tissues at this dose level.
Metabolism: Major component in urine and fecal extracts was identified as the unchanged parent compound, XR-570, representing ~77–85% of administered dose. Two other metabolites found in excreta were characterized as OH-phenyl-XR-570 (~3–10% of the administered dose) and a sulfate conjugate of OH-phenyl-XR-570 (~2–4% of the administered dose). Two minor peaks were not identified (neither represented greater than 0.32% of the administered dose). Sulfate conjugate of the OH-phenyl-XR-570 was not observed in fecal extracts and was either not detected or not quantifiable in urine of females at any dose level. Metabolites in urine and feces revealed no evidence of hydrolysis of sulphonamide bridge. XR-570 was metabolized only slightly in the kidneys, liver and blood with the parent compound accounting for greater than 90% of the recovered radioactivity in these tissues at C_{max} and $C_{½max}$. In the bile, the unchanged parent compound, XDE-570 accounted for 0.09% of the administered dose.
Excretion: Excretion was rapid, with a majority of radioactivity being eliminated within 12 h post-dosing via urine (>80 and 60% at the LD and HD, respectively) and within 24 h post-dosing via feces (3–6 and 11–15% at the LD and HD, respectively). Urinary excretion rate half-life ($t_{½}$) was ~3–4 and 5 h at the LD and HD, respectively. Major route of excretion was via urine, accounting for ~90–92 and 81–85% of administered dose at the LD and HD, respectively. Fecal excretion accounted for ~5–7 and 14–17% of administered dose at the LD and HD, respectively. By 24 h less than 0.5% of administered dose was excreted via expired air and ~1% was excreted by the bile.
No significant differences in absorption, distribution, metabolism or excretion or changes in pharmacokinetic parameters between the LD aniline labeled and pyrimidine labeled groups. Absorption, distribution, metabolism and excretion not influenced by repeat LD oral administration. No significant sex-related difference in absorption, distribution, metabolism or excretion following single or repeat LD administration or single HD administration.

STUDY	SPECIES OR STRAIN AND DOSES	LD_{50} LC_{50} MIS OR MAS	TARGET ORGAN AND SIGNIFICANT EFFECTS AND COMMENTS
ACUTE STUDIES: Technical florasulam (XDE-570)			
Oral	CD-1 mice 5 mice/sex/dose **Dose levels**: 600 (♀ only), 2000 (♀ only) or 5000 (both sexes) mg/kg bw	Lethal dose 50% (LD_{50}) greater than 5000 mg/kg bw for both sexes	No mortalities at 600 or 2000 mg/kg bw. At 5000 mg/kg bw, 2 ♀ died at approximately 24 h. No treatment-related clinical observations, necropsy findings or changes in bw **LOW TOXICITY**
Oral	Fischer 344 rats 5 rats/sex/dose **Dose levels**: 1000, 3000 or 6000 mg/kg bw	LD_{50} greater than 6000 mg/kg bw for both sexes	No mortalities at 1000 or 3000 mg/kg bw. At 6000 mg/kg bw, 1 male (d 7) and 2 ♀ (d 2 and d 7) died (bw loss prior to death). No treatment-related clinical observations, necropsy findings or changes in bw **LOW TOXICITY**
Dermal: Limit test	New Zealand white (NZW) rabbits 5 rabbits/sex **Dose level**: 2000 mg/kg bw	LD_{50} greater than 2000 mg/kg bw for both sexes	No mortalities and no treatment-related clinical observations, necropsy findings or changes in bw **LOW TOXICITY**
Inhalation: Limit test (4-h nose-only)	Fischer 344 rats 5 rats/sex **Dose level** Analytical concentration: 5.0 mg/L (mass median aerodynamic diameter = 4.07 μm; GSD = 2.37)	LC_{50} > 5.0 mg/L	No mortalities and no treatment-related clinical observations, necropsy findings or changes in bw **LOW TOXICITY**
Eye irritation	NZW rabbits 3 rabbits/sex **Dose level**: 0.1 g	Maximum irritation score (MIS): 2.67/110 at 1 h Maximum average score (MAS) (for 24, 48 and 72 h): 0.0/110	Very slight conjunctival redness and discharge in 3/6 animals and very slight chemosis in 2/6 animals at 1 h; resolved by 24 h **MINIMALLY IRRITATING**
Skin irritation	NZW rabbits 3 rabbits/sex **Dose level**: 0.5 g	MIS: 0.17/8 at 24, 48 and 72 h and at 7 days MAS (for 24, 48 and 72 h): 0.17/8	One rabbit developed very slight edema by 24 h; resolved by day 8 **MINIMALLY IRRITATING**
Skin sensitization (Buehler method)	Hartley albino guinea pigs 10 ♂ in treatment group and 5 ♂ in naive control group **Dose level**: 0.4 g XDE-570 moistened with 0.2 mL distilled water for induction and challenge treatments	No dermal reactions observed at any time after induction or challenge treatment	**NOT A DERMAL SENSITIZER**
Skin sensitization (Guinea pig Maximisation test of Magnusson and Kligman)	Dunkin/Hartley guinea pigs 20 ♂ in treatment group and 10 ♂ in naive control group **Dose levels** Induction Intradermal: 1.0% w/v XDE-570 in Alembicol D Topical: 100% w/v XDE-570 in Alembicol D Challenge: 100 and 50% w/v XDE-570 in Alembicol D	No dermal reactions observed at 24 or 48 h after challenge treatment	**NOT A DERMAL SENSITIZER**

STUDY	SPECIES OR STRAIN AND DOSES	LD_{50} LC_{50} MIS OR MAS	TARGET ORGAN AND SIGNIFICANT EFFECTS AND COMMENTS
ACUTE STUDIES: Formulation DE-570 g/L SC Herbicide (EF-1343)			
Oral: Limit test	CD-1 mice 5 mice/sex **Dose level**: 5000 mg/kg bw	LD_{50} greater than 5000 mg/kg bw in both sexes	No mortalities and no treatment-related clinical observations, necropsy findings or changes in bw **LOW TOXICITY**
Oral: Limit test	Fischer 344 rats 5 rats/sex **Dose level**: 5000 mg/kg bw	LD_{50} greater than 5000 mg/kg bw in both sexes	No mortalities and no treatment-related clinical observations, necropsy findings or changes in bw **LOW TOXICITY**
Oral: Limit test	CD (remote Sprague-Dawley origin) rats 5 rats/sex **Dose level**: 2000 mg/kg bw	LD_{50} greater than 2000 mg/kg bw in both sexes	No mortalities and no treatment-related clinical observations, necropsy findings or changes in bw **LOW TOXICITY**
Dermal: Limit test	CD strain rats (remote Sprague-Dawley) 5 rats/sex **Dose level**: 2000 mg/kg bw	LD_{50} greater than 2000 mg/kg bw in both sexes	No mortalities and no treatment-related clinical observations, necropsy findings or changes in bw **LOW TOXICITY**
Inhalation	A waiver in lieu of conduct of an acute inhalation study was requested. The formulation is a liquid formulation. The vapour pressure of the technical grade active ingredient, DE-570, is 1×10^{-5} Pa at 25°C. The formulation is to be applied to cereals by field crop sprayers that do not generate a significant proportion (greater than 1% on a weight basis) of particles or droplets of diameter less than 50 μm. This waiver request is acceptable. The formulations are expected to have low toxicity via the acute inhalation route of exposure.		
Eye irritation	Outbred strain of NZW rabbits 3 ♀ **Dose level**: 0.1 mL of undiluted test substance	MIS: 2.0/110 at 1 h MAS (for 24, 48 and 72 h): 0.22/110	Minimal conjunctival redness in 3/3 animals; resolved by 48 h **MINIMALLY IRRITATING**
Eye irritation	Outbred strain of NZW rabbits 3 rabbits/sex **Dose level**: 0.1 mL of undiluted test substance	MIS: 2.0/110 at 1 h MAS (for 24, 48 and 72 h): 0.11/110	Slight conjunctival redness 5/6 animals and slight chemosis in 1/6 animals at 1 h, resolved by 48 h **MINIMALLY IRRITATING**
Skin irritation	CD strain rats (remote Sprague-Dawley) 5 rats/sex **Dose level**: 2000 mg/kg bw	MIS: 0/8 MAS (for 24, 48 and 72 h): 0/8	No dermal irritation observed at any time **NON-IRRITATING**
Skin sensitization (Modified Buehler method)	Dunkin Hartley albino guinea pigs 10 animals/sex in treatment group and 5 animals/sex in naive control group **Dose level**: 0.5 mL undiluted test substance for induction (9 treatments) and challenge (1 treatment) treatments	No dermal reactions observed at any time after induction or challenge treatment	**NOT A DERMAL SENSITIZER**

STUDY	SPECIES OR STRAIN AND DOSES	NOAEL AND LOAEL (mg/kg bw/d)	TARGET ORGAN AND SIGNIFICANT EFFECTS AND COMMENTS
SHORT TERM: Technical florasulam (XDE-570)			
90-d dietary: mouse	10 B6C3F$_1$ mice/sex/dose **Dose level**: 0, 20, 100, 500 or 1000 mg/kg bw/d	**NOAEL**: 100 mg/kg bw/d **LOAEL**: 500 mg/kg bw/d	500 mg/kg bw/d: hypertrophy epithelial cells collecting ducts (♂) 1000 mg/kg bw/d: hypertrophy epithelial cells collecting ducts (both sexes) **Control week 13 bw** ♂: 31.4 g ♀: 25.6 g **Control week 13 daily food consumption** ♂: 6.0 g/animal ♀: 6.4 g/animal
90-d dietary (with 4-week recovery): rat	10 Fischer 344 rats/sex/dose **Dose levels**: 0, 20, 100, 500, 800 (♀ only) or 1000 (♂ only) mg/kg bw/d	**NOAEL**: 100 mg/kg bw/d **LOAEL**: 500 mg/kg bw/d	500 mg/kg bw/d and above: lower bw and bwg (♀); marginal ↓ red blood cell (RBC) counts, hemoglobin (HGB) and hematocrit (HCT) (♂); urinary acidification (♂ and ♀); ↑ kidney weight (♂ and ♀); hypertrophy epithelial cells collecting ducts (♂ and ♀); degeneration and regeneration descending portion proximal tubules (♀) 800 mg/kg bw/d (♀ only): lower food consumption; multi-focal mineralization renal papilla 1000 mg/kg bw/d (♂ only): lower bw, bwg and food consumption; ↓ urinary SG **Control week 13 bw** ♂: 316 g ♀: 180 g **Control week 13 daily food consumption** ♂: 18.6 g/animal ♀: 12.0 g/animal
90-d dietary: dog	4 dogs/sex/dose (Beagle) **Dose levels:** 0, 5, 50 or 100 mg/kg bw/d	**NOAEL**: 5 mg/kg bw/d **LOAEL**: 50 mg/kg bw/d	50 mg/kg bw/d and above: ↑ ALP (♂ and ♀); ↑ incidence/severity hepatic vacuolation (♂ and ♀); hypertrophy epithelial cells collecting ducts (♂ and ♀). 100 mg/kg bw/d: ↑ liver weight (♂ and ♀)

STUDY	SPECIES OR STRAIN AND DOSES	NOAEL AND LOAEL (mg/kg bw/d)	TARGET ORGAN AND SIGNIFICANT EFFECTS AND COMMENTS
12-month dietary: dog	4 dogs/sex/dose (Beagle) **Dose levels:** 0, 0.5, 5 or 100/50* mg/kg bw/d * Due to bw loss and lower food consumption at 100 mg/kg bw/d (♂ and ♀) during the first 3 months of the study (up to study day 104), the HD level was decreased to 50 mg/kg bw/d (beginning study day 105) for reasons of animal welfare.	**NOAEL**: 5 mg/kg bw/d **LOAEL**: 50 mg/kg bw/d	Findings at 100 mg/kg bw/d, prior to decreasing HD to 50 mg/kg bw/d: lower bw, bwg and food consumption (♂ and ♀); ↑ ALAT and ALP and ↓ albumin and protein (♂ and ♀) 50 mg/kg bw/d (beginning day 105): lower bw, bwg and food consumption (♀); ↑ ALP and ↓ albumin and protein (♂ and ♀); ↑ severity hypertrophy epithelial cells collecting ducts (♂ and ♀); slight vacuolization zona reticularis and zona fasciculata adrenal gland, toxicological significance uncertain (♂ and ♀)
4-week dermal: rat	5 Fischer 344 rats/sex/dose **Dose levels**: 0, 100, 500 or 1000 mg/kg bw/d	**Systemic** NOAEL: 1000 mg/kg bw/d LOAEL: Not determined	No treatment-related systemic findings in either sex **Local irritation**: Slight transient erythema and edema at application site (♂ at 1000 mg/kg bw/d)
CHRONIC TOXICITY OR ONCOGENICITY: Technical florasulam (XDE-570)			
2-year dietary: mouse	60 B6C3F$_1$ mice/sex/dose (10/sex/dose sacrifice at 1 year and 50/sex/dose sacrifice at 2 years) **Dose levels**: 0, 50, 500 or 1000 mg/kg bw/d	**Chronic toxicity** NOAEL: 50 mg/kg bw/d LOAEL: 500 mg/kg bw/d	500 mg/kg bw/d and above: ↓ kidney weight (♂, no clear dose–response relationship); ↓ cytoplasmic vacuolation cortical tubular epithelium cells (♂); hypertrophy epithelial cells collecting ducts (♂ and ♀); ↓ incidence (♀) or severity (♂) of age-related tubular degeneration with regeneration No evidence to indicate any carcinogenic potential of florasulam up to and including 1000 mg/kg bw/d (HDT)

STUDY	SPECIES OR STRAIN AND DOSES	NOAEL AND LOAEL (mg/kg bw/d)	TARGET ORGAN AND SIGNIFICANT EFFECTS AND COMMENTS
2-year dietary: rat	60 Fischer 344 rats/sex/dose (10 rats/sex/dose interim sacrifice + 50 rats/sex/dose terminal sacrifice) **Dose levels**: 0, 10, 125 (♀ only), 250 or 500 (♂ only) mg/kg bw/d	**Chronic toxicity** NOAEL: 10 mg/kg bw/d LOAEL: 125 mg/kg bw/d	125 mg/kg bw/d (♀ only): marginal to slight ↑ kidney weight; equivocal urinary acidification; hypertrophy epithelial cells collecting duct 250 mg/kg bw/d: lower bw, bwg and food consumption (♀); urinary acidification (♂ and ♀); ↑ kidney weight (♂ and ♀); hypertrophy epithelial cells collecting duct (♂ and ♀); ↓ incidence age-related tubular degeneration and regeneration (♂); ↓ severity (♂) and incidence (♀) geriatric renal degeneration (chronic progressive glomerularnephropathy) 500 mg/kg bw/d (♂ only): lower bw, bwg and food consumption; ↓ RBC counts, HGB and HCT, reversed by 24 months; ↑ serum bicarbonate; urinary acidification, ↓ urinary SG and proteinuria; ↑ kidney weight; hypertrophy epithelial cells collecting duct; ↓ incidence age-related tubular degeneration or regeneration; ↓ severity geriatric renal degeneration (chronic progressive glomerularnephropathy); minimal reactive hyperplasia transitional epithelium; unilateral necrosis papilla No evidence to indicate any carcinogenic potential of florasulam up to and including 250 mg/kg bw/d, HDT in ♀ and up to and including 500 mg/kg bw/d, HDT in ♂

STUDY	SPECIES OR STRAIN AND DOSES	NOAEL AND LOAEL (mg/kg bw/d)	TARGET ORGAN AND SIGNIFICANT EFFECTS AND COMMENTS
REPRODUCTION AND DEVELOPMENTAL TOXICITY: Technical florasulam (XDE-570)			
Multi-generation: rat (1 litter/ generation)	30 CD (Sprague-Dawley derived) rats/sex/group **Dose levels**: 0, 10, 100 or 500 mg/kg bw/d	**Parental** NOAEL: 100 mg/kg bw/d LOAEL: 500 mg/kg bw/d **Offspring** NOAEL: 100 mg/kg bw/d LOAEL: 500 mg/kg bw/d **Reproductive** NOAEL: 500 mg/kg bw/d LOAEL: Not determined	**Parental** 500 mg/kg bw/d: lower bw, bwg and food consumption P_2 ♂ and P_1/P_2 ♀; ↑ kidney weight (P_2 ♂ and P_1/P_2 ♀); hypertrophy epithelial cells collecting duct (P_1/P_2 both sexes) **Offspring** 500 mg/kg bw/d: transient lower bw on lactation days 4 and 7, comparable to control by lactation day 14 (F_1/F_2 both sexes), possibly secondary to lower maternal food consumption early in lactation period **Reproductive** No adverse treatment-related effects on reproductive parameters up to and including 500 mg/kg bw/d (HDT)
Developmental: rat	25–27 sexually mature female CD (Sprague-Dawley) rats/dose **Dose levels**: 0, 50, 250 or 750 mg/kg bw/d	**Maternal toxicity**: NOAEL: 250 mg/kg bw/d LOAEL: 750 mg/kg bw/d **Developmental toxicity:** NOAEL: 750 mg/kg bw/d LOAEL: not determined	**Maternal toxicity** 750 mg/kg bw/d: lower bw, bwg and food consumption; ↑ kidney weight (no corroborating gross pathological findings, no histopathology done, toxicological significance uncertain); 4 mortalities at 750 mg/kg bw/d, 3 deaths were attributed to gavage error, cause of the 4th death not determined, treatment-related cause not excluded; dams pregnant with normally developing fetuses **Developmental toxicity**: No significant treatment-related findings at any dose level up to and including 750 mg/kg bw/d (HDT) **Teratogenicity**: No evidence of any treatment-related irreversible structural changes at any dose level up to and including 750 mg/kg bw/d (HDT); therefore, under the conditions of the study, florasulam was not teratogenic.

STUDY	SPECIES OR STRAIN AND DOSES	NOAEL AND LOAEL (mg/kg bw/d)	TARGET ORGAN AND SIGNIFICANT EFFECTS AND COMMENTS
Preliminary Developmental: rabbit	7 sexually mature female NZW rabbits/dose **Dose levels**: 0, 100, 300, 600 or 1000 mg/kg bw/d	**Maternal toxicity** NOAEL: 300 mg/kg bw/d LOAEL: 600 mg/kg bw/d **Developmental toxicity** NOAEL: not determined LOAEL: not determined	**Maternal toxicity:** 600 mg/kg bw/d: 1 death (14%) with severe bw loss, markedly lower food consumption and fecal output prior to death; remaining dams exhibited bw loss (food consumption unaffected) during gestation days 7–10; lower bwg and food consumption during remainder of gestation 1000 mg/kg bw/d: 3 deaths (43%) with severe bw loss, markedly lower food consumption and fecal output prior to death; remaining dams lower bwg and food consumption; euthanized on gestation day 17 **Developmental toxicity**: No fetal evaluation; dams sacrificed on gestation day 20 **Teratogenicity**: No fetal evaluation; dams sacrificed on gestation day 20
Developmental: rabbit	20 sexually mature female NZW rabbits/dose **Dose levels**: 0, 50, 250 or 500 mg/kg bw/d	**Maternal toxicity** NOAEL: >500 mg/kg bw/d LOAEL: not determined **Developmental toxicity** NOAEL: >500 mg/kg bw/d LOAEL: not determined	**Maternal toxicity**: No treatment-related findings at any dose level up to and including 500 mg/kg bw/d (HDT) **Developmental toxicity**: No treatment-related findings at any dose level up to and including, 500 mg/kg bw/d (HDT) **Teratogenicity**: No evidence of any treatment-related irreversible structural changes at any dose level up to and including 500 mg/kg bw/d (HDT); therefore, under the conditions of the study, florasulam was not teratogenic.

STUDY	SPECIES OR STRAIN OR CELL TYPE	DOSE LEVELS	SIGNIFICANT EFFECTS AND COMMENTS
GENOTOXICITY: Technical florasulam (XDE-570)			
Salmonella/Ames Test/*Escherichia coli* bacterial mutation assay	*Salmonella typhimurium* strains TA98, TA100, TA1535 and TA1537 and *E. coli* strain WP_2uvrA	0, 0.333, 1.00, 3.33, 10, 33.3 or 100 μg/plate for *S. typhimurium* and 0, 10, 33.3, 100, 333, 1000 or 3330 μg/plate for *E. coli* ± S9 metabolic activation	**Negative** for both *S. typhimurium* and *E. coli* tester strains
Mammalian chromosomal aberration (in vitro)	Chinese hamster ovary cells (at the HGPRT locus)	0, 187.5, 375, 750 or 3000 μg/mL ±S9 metabolic activation.	**Negative**
Mammalian cytogenetics (in vitro)	Primary rat lymphocytes	0, 3, 10, 30, 100, 300, 1000 or 3000 μg/mL ± S9 metabolic activation	**Negative**
Micronucleus assay (in vivo)	Male and female mouse bone marrow cells (erythrocytes)	0, 1250, 2500 or 5000 mg/kg bw	**Negative**
STUDY	**SPECIES OR STRAIN AND DOSES**	**NOAEL AND LOAEL (mg/kg bw/d)**	**TARGET ORGAN AND SIGNIFICANT EFFECTS AND COMMENTS**
SPECIAL STUDIES: Technical florasulam (XDE-570)			
Acute neurotoxicity screening battery: rat	10 young-adult Fischer 344 rats/sex/dose **Dose levels**: 0, 200, 1000 or 2000 mg/kg bw	**Systemic** NOAEL: 1000 mg/kg bw LOAEL: 2000 mg/kg bw **Neurotoxicity** NOAEL: 2000 mg/kg bw LOAEL: Not determined	**Systemic toxicity** 2000 mg/kg bw: lower bwg (♂); slight transient ↓ motor activity, ↑ incidence of minimal level of activity in open field and ↑ incidence of minimal responsiveness to sharp noise on day of dosing (♂); suggest slight transient depression of activity and reactivity on day of dosing; probably due to general malaise and not to neurotoxicity per se **Neurotoxicity** No evidence of neurotoxicity in either sex up to and including 2000 mg/kg bw (limit dose)
Chronic neurotoxicity screening battery: rat	10 young-adult Fischer 344 rats/sex/dose **Dose levels**: 0, 10, 125 (♀ only), 250 or 500 (♂ only) mg/kg bw/d	**Systemic** NOAEL: 250 mg/kg bw/d LOAEL: 500 mg/kg bw/d **Neurotoxicity** NOAEL: 250 mg/kg bw/d LOAEL: Not determined	**Systemic toxicity** 500 mg/kg bw/d: lower bw and bwg (♂) **Neurotoxicity**: No evidence of neurotoxicity in either sex up to and including 500 mg/kg bw/d (♂ HDT) and 250 mg/kg bw/d (♀ HDT)

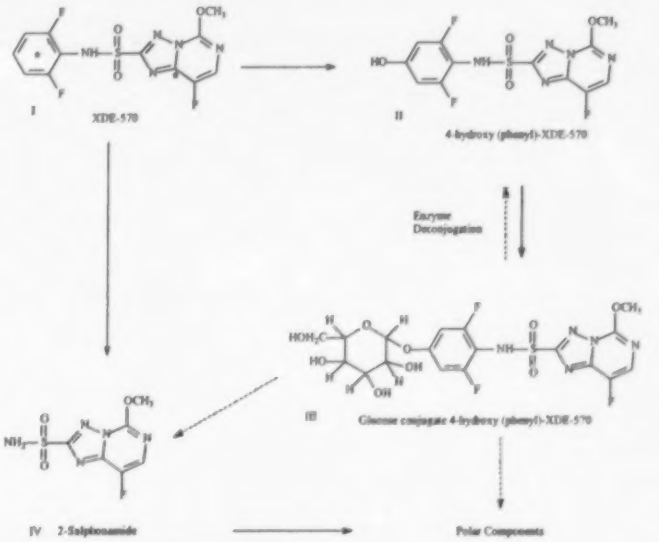
STUDY	SPECIES OR STRAIN AND DOSES	NOAEL AND LOAEL (mg/kg bw/d)	TARGET ORGAN AND SIGNIFICANT EFFECTS AND COMMENTS
SPECIAL STUDIES: Formulation DE-570 g/L SC Herbicide (EF-1343)			
4-week dermal: rat EUP: EF-1343 (XDE-570 50 SC)	5 young adult Fischer 344 rats/sex/dose **Dose levels**: 0, 100, 500 or 1000 mg/kg bw/d	**Systemic** NOAEL: 1000 mg/kg bw/d LOAEL: Not determined	No treatment-related systemic findings in either sex at any dose level up to and including 1000 mg/kg bw/d (HDT) No signs of dermal irritation at the dermal application site in any control or treatment groups animal
Compound-induced mortality: There was no significant increased incidence of treatment-related mortalities in any short-term, long-term or special studies. However, in a rat developmental study, there were 4 mortalities (4/27, ~15%) at 750 mg/kg bw/d (HDT), 3 deaths were attributed to gavage error, cause of the 4th death not determined although treatment-related cause was not excluded. In a rabbit preliminary developmental study, mortalities were observed at 600 (1/7, ~14%) and 1000 mg/kg bw/d (3/7, ~43%), all of these dams exhibited severe bw loss, markedly lower food consumption and decreased fecal output prior to death. All of these dams were pregnant with normally developing fetuses. These deaths were considered to be treatment-related, however, possibility of gavage error could not be eliminated as possible cause of death since the dam at 600 mg/kg bw/d and 2 dams at 1000 mg/kg bw/d exhibited edematous lungs. There were no treatment-related deaths in the main rabbit developmental toxicity study at any dose level up to and including 500 mg/kg bw/d (HDT).			
Recommended ARfD: An ARfD was not established, since florasulam was considered unlikely to present an acute hazard. There were no significant treatment-related findings in the acute, short-term, 2-generation reproduction or developmental toxicity studies or in the acute or subchronic neurotoxicity studies to indicate a concern in acute dietary risk assessment.			
Recommended ADI: The most appropriate NOAEL of 5.0 mg/kg bw/d in the 1-year dietary study in dogs is recommended as the basis for the ADI. Treatment-related findings at the LOAEL (next highest dose level) included lower body weight, body-weight gain and food consumption (♀), increased ALP activity (both sexes) and decreased serum albumin and protein levels (both sexes) at 50 mg/kg bw/d and increased severity of hypertrophy of the epithelial cells of the collecting ducts and slight vacuolization of the zona reticularis and zona fasciculata in the adrenal glands in both sexes at 100 and 50 mg/kg bw/d. A safety factor of 100 to account for intra- and inter-species variations was applied to this NOAEL to determine the ADI. No additional safety factor is required. The recommended ADI is 0.05 mg/kg bw/d. **MOE for other critical end point(s)**: calculated as NOAEL/ADI Developmental toxicity: NOAEL = 250 mg/kg bw/d (rat). The MOE for developmental toxicity is 5000 compared with the ADI. 2-generation reproduction study: Reproductive toxicity: NOAEL = 500 mg/kg bw/d. The MOE is 10 000 compared with the ADI Offspring toxicity: NOAEL = 100 mg/kg bw/d. The MOE is 2000 compared with the ADI		

Appendix II Residues

PROPOSED CANADIAN USE PATTERN							
Crop	Formulation type	Application					Restrictions
		Method and timing	Rate (g a.i./ha)	Number per season	Maximum rate (g a.i./ha)	Preharvest interval (PHI) (days)	
Wheat (spring, durum), barley (spring), oats	EF-1343 Suspension concentrate (50 g/L)	Post-emergent 2-leaf crop up to and including the flag leaf extended stage	5	1	5	60	Do not apply by air. Do not harvest the treated crop within 60 DAT. Livestock may be grazed on treated crops 7 d following application. Fields previously treated with EF-1343 herbicide can be seeded the following year to barley, canola, forage grasses, oats, peas, rye or wheat, or fields can be summer fallowed.

PLANT METABOLISM

Florasulam is readily metabolized in wheat through hydroxylation in the 4-position of phenyl ring followed by glucose conjugation. Additional degradation was followed by tentative cleavage of the sulphonamide bridge. The metabolites detected in wheat matrices were 4-OH-(phenyl)-florasulam, glucose conjugate of 4-OH-(phenyl)-florasulam and 2-sulphonamide. The 4-OH-(phenyl)-florasulam and glucose conjugate of 4-OH-(phenyl)-florasulam were both present in rat metabolism. The 2-sulphonamide metabolite was found (0.059 ppm) only in the winter wheat straw and not in the grain when treated with florasulam at 10× the proposed Canadian label rate of 5 g a.i./ha.



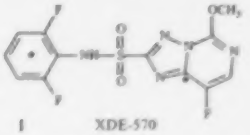
ROC: The ROC is defined as the parent, florasulam.

Timing and method of application	Matrix	PHI (days)	Total radioactive residues (ppm)	
			[Phenyl-UL-^{14}C] florasulam label 50 g a.i./ha (10 × GAP)	[9-triazolopyrimidine-^{14}C] florasulam label 50 g a.i./ha (10 × GAP)
BASF, Bayer, Ciba-Geigy and Hoechst (BBCH) 30 growth stage (stem elongation) and foliar spray	Immature whole wheat plant	0	4.1	3
		30	0.4	0.4
	Mature wheat straw	129	0.048	0.07
	Mature wheat ears	129	0.0027	0.008
	Mature wheat grain	129	0.0013	0.0022
BBCH 49 growth stage (postflag leaf emergence) and foliar spray	Immature whole wheat plant	0	0.68	0.76
		30	0.12	0.13
	Mature wheat straw	65	0.41	0.3
	Mature wheat ears	65	0.03	0.03
	Mature wheat grain	65	0.0024	0.0081

CONFINED CROP ROTATION STUDIES
7.5 g a.i./ha (1.5 × the proposed GAP) was applied to soil; spring wheat, sunflower, cabbage and carrots were planted at 30 DAT.

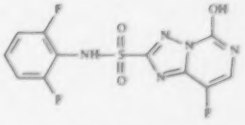
Crop	Crop fraction	Planting interval (DAT)	Harvest interval (DAT)	[Phenyl-UL-^{14}C] florasulam label (ppm)	[9-triazolopyrimidine-^{14}C] florasulam label (ppm)
Spring wheat	Ears	30	168	<0.001	0.001
	Straw	30	168	0.003	0.004
Sunflowers	Heads	30	168	<0.001	<0.001
	Stems	30	168	0.002	0.005
Cabbage	Heads	30	195	<0.001	0.002
Carrots	Leaves	30	156	<0.001	0.01
	Roots	30	156	<0.001	0.002

ANIMAL METABOLISM
The metabolism of florasulam in the rat, goat and laying hen were similar. Therefore, swine metabolism is not required. In all three species, the majority of the radioactivity was found in the excreta. Most of the parent compound in goat, hen and rat was eliminated unchanged with minor unknown metabolites at unquantifiable levels. No significant cleavage of the sulfonanilide bridge occurred in the metabolism of any of the three species.



I XDE-570

Minor metabolites



II 5-OH-XDE-570

ROC: The ROC is defined as the parent, florasulam.

Matrix	[Phenyl-UL-^{14}C] florasulam label		[9-triazolopyrimidine-^{14}C] florasulam label	
	ppm	% administered dose	ppm	% administered dose
GOAT METABOLISM				
Kidney	0.069	0.01	0.039	0.007
Liver	0.033	0.028	0.023	0.023
Milk	0.016	0.052	0.033	0.085
Muscle	0.0016	0.025	0.0009	0.015
Fat	0.0016	0.008	0.0017	0.009
Blood	0.007	0.014	0.0053	0.011
Urine and cage wash	5.92	72.6	4.46	70.9
Feces	2.65	15.8	2.14	12.1
HEN METABOLISM				
Composite muscle	0.0005	<0.0001	0.0008	<0.0001
Composite fat	0.0004	<0.0001	0.0006	<0.0001
Liver	0.0014	<0.0001	0.001	<0.0001
Skin	0.0066	0.002	0.005	0.002
Eggs	0.0038	0.013	0.004	0.013
Excreta	10	91.3	11.5	96.9

FREEZER STORAGE STABILITY TESTS Stability of florasulam in wheat substrates at –20°C Plant metabolism and residue samples were stored within the stable time periods.				
Commodity	**Storage interval (days)**	**Spiking level (ppm)**	**Freshly spiked residues recovered ± SD (%)**	**Stored spiked residues recovered ± SD (%)**
Wheat grain	0–123	0.5	98 ± 12	110 ± 11
	123–264	0.5	93	86
Wheat forage	0–183	0.5	87 ± 9	100 ± 7
	183–378	0.5	93	77
Wheat straw	0–313	0.5	84 ± 6	98 ± 10
Wheat hay	0–194	0.5	97 ± 9	93 ± 8
	194–350	0.5	87	62
Wheat immature green plants	0–94	0.5	102 ± 11	94 ± 8
	94–389	0.5	88 ± 1	60 ± 5
Wheat immature dried plants	0–94	0.5	103 ± 8	108 ± 12
	94–389	0.5	88 ± 1	82 ± 2

NUMBER OF FIELD TRIALS BY CANADIAN OR U.S. GROWING REGION									
Crop	**Residue trials**	**Canadian and Canadian Equivalent U.S. Growing Regions**							**Total trials**
		1	**5**	**5A**	**5B**	**7**	**7A**	**14**	
Wheat	Submitted					6	1	6	13
	Requested		2			7 (5)	1	10 (7)	20 (15)
	Deficient		**2**					**1**	**3**
Barley	Submitted					4	1	4	9
	Requested		1		1	2		12 (9)	16 (13)
	Deficient		**1**		**1**			**5**	**7**
Oats	Submitted					5	1	3	9
	Requested	1	1	1	1	2		10 (7)	16 (13)
	Deficient	**1**	**1**	**1**	**1**			**4**	**8**

(#) Number of residue trials reduced by 25% (residues from all trials were <0.025 ppm, i.e., less than the LOD)

SUPERVISED RESIDUE TRIALS

The results from the supervised crop field trial studies in wheat (including durum wheat), barley and oats conducted in the North American representative zones (7, 7A and 14) have shown that residues in wheat grain, barley grain and oat grain collected at 41–60 d following a single foliar broadcast ground application of EF-1343 Suspension Concentrate (52 g a.i./L), at a rate of approximately 10 g a.i./ha of florasulam with 0.2% (v/v) Agral 90 Adjuvant, when plants were at BBCH 37–55 stage, equivalent to 2× the proposed Canadian maximum season application rate, were less than the LOQ (0.01 ppm).

Commodity and portion analysed	Formulation	Application			PHI (days)	Residues (ppm)
		No.	Total rate (g a.i./ha)	%-GAP		
WHEAT						
Grain	EF-1343 SC	1	10	200	41–60	< 0.01
Forage	EF-1343 SC	1	10	200	7–40	<0.05
Straw	EF-1343 SC	1	10	200	48–58	<0.05
Hay	EF-1343 SC	1	10	200	7–30	<0.05
Immature green plants	EF-1343 SC	1	10	200	7–30	<0.05
Immature dry plants	EF-1343 SC	1	10	200	7–40	<0.05
BARLEY						
Grain	EF-1343 SC	1	10	200	45–60	<0.01
Straw	EF-1343 SC	1	10	200	47–57	<0.05
Hay	EF-1343 SC	1	10	200	7–30	<0.05
Immature green plants	EF-1343 SC	1	10	200	7–40	<0.05
Immature dry plants	EF-1343 SC	1	10	200	7–40	<0.05
OATS						
Grain	EF-1343 SC	1	10	200	51–58	<0.01
Forage	EF-1343 SC	1	10	200	7–40	<0.05
Straw	EF-1343 SC	1	10	200	51–58	<0.05
Hay	EF-1343 SC	1	10	200	7–30	<0.05
Immature green plants	EF-1343 SC	1	10	200	7–40	<0.05
Immature dry plants	EF-1343 SC	1	10	200	7–40	<0.05

PROCESSING STUDIES
Residue levels of florasulam in wheat, barley and oat RAC
It is unlikely that residues of florasulam in processed food items will concentrate when treated according to the proposed Canadian use pattern (5 g a.i./ha). The proposed MRL of 0.01 ppm for the RAC will cover potential residues of florasulam in the processing commodities of wheat, barley and oats.

LIVESTOCK AND POULTRY FEEDING STUDY
Residue levels of florasulam in animal food products
Results of the animal metabolism studies demonstrated that if livestock consumed wheat, barley and oat crops treated at the proposed Canadian label application rate of 5 g a.i./ha, potential residues of florasulam in food of animal origin would unlikely be at levels above the LOQ of 0.01 ppm. Therefore, livestock feeding studies are not needed in support of this petition.

MRLs			
Crop	**Proposed Canadian MRLs (ppm)**	**U.S. tolerances (ppm)**	**Codex CXLs (ppm)**
Wheat	0.01	None established at this time	None established at this time
Barley	0.01	None established at this time	None established at this time
Oats	0.01	None established at this time	None established at this time

CHRONIC DIETARY RISK ASSESSMENT
Using DEEM Software based on the 1994–1998 CSFII
ADI = 0.05 mg/kg bw/d

Consumer	**All populations**	**All infants (<1 year)**	**Children (1–6 years)**	**Children (7–12 years)**	**Children (13–19 years)**	**Adults (20+ years)**	**Seniors (55+ years)**
Tier I: Using the proposed MRLs for wheat (0.01 ppm), barley (0.01 ppm) and oats (0.01 ppm)							
% of ADI	10	10	10	10	10	10	10
Tier II: Using the actual median residues for wheat, barley and oats							
% of ADI	10	10	10	10	10	10	10

No additional refinement of dietary risk is required at this time. The major contributor of dietary risk for all age groups is water, which is allocated a value of 10%.

Appendix III Environmental assessment

Table 1 Maximum EEC in vegetation and insects after a direct overspray

Matrix	EEC (mg a.i./kg fw)[a]	Fresh to dry weight ratios	EEC (mg a.i./kg dw)
Short range grass	1.07	3.3[b]	3.5311
Leaves and leafy crops	0.56	11[b]	6.16
Long grass	0.49	4.4[b]	2.156
Forage crops	0.26	5.4[b]	1.404
Small insects	0.26	3.8[c]	0.988
Pods with seeds	0.0535	3.9[c]	0.2087
Large insects	0.0445	3.8[c]	0.1691
Grain and seeds	0.0445	3.8[c]	0.1691
Fruit	0.031	7.6[c]	0.2356

[a] Based on correlations reported in Hoerger and Kenaga (1972) and Kenaga (1973)
[b] Fresh to dry weight ratios from Harris (1975)
[c] Fresh to dry weight ratios from Spector (1956)

Table 2 Physical and chemical properties of florasulam relevant to the environment

Property	Value	Comments
Water solubility (g/L)	pH / Solubility 5 / 0.084 7 / 6.36 9 / 94.2	Soluble at pH 5 and very soluble at pH 7 and 9
Vapour pressure (Pa)	1×10^{-5} at 25°C	Relatively non-volatile
H	2.29×10^{-5} Pa m^3 mol^{-1}	Non-volatile from a water or moist soil surface
log K_{ow}	pH / log K_{ow} 4 or 5 / 1.00 7 / –1.85 9 or 10 / –2.06	Bioconcentration is unlikely.
pK_a	4.54	Neutral molecule will predominate at pH >4.54. Adsorption will decrease as pH increases.
UV–visible absorption	Form / λmax Acidic / 259.8 203.8 Basic / 262.4 209.7 Methanolic / 204.1 No absorbance maxima above 300 nm	Low potential for phototransformation

Table 3 Physical and chemical properties of 5-hydroxy-XDE-570 relevant to the environment

Property	Value	Comments
Water solubility at 20°C (g/L)	pH / Solubility 5 / 0.633 7 / > 450.0 9 / > 800.0	Very soluble at all environmentally relevant pH
Vapour pressure (Pa)	2.7×10^{-6} at 25°C	Relatively non-volatile
H	2.63×10^{-6} Pa m^3 mol^{-1}	Nonvolatile from a water or moist soil surface
	pH / log K_{ow} 5 / 0.32 7 / –1.85 9 / –2.32	Bioconcentration is unlikely.
pK_a	4.53 (pH = 3.0–5.5) 7.22 (pH = 6.0–8.5)	Neutral molecule will predominate at pH >4.53 and anionic form will predominate at pH >7.22.

Table 4 Fate and behaviour in the terrestrial environment

Study	Test substance[a]	Value or result	Comments
Abiotic transformation			
Hydrolysis	PH- and TP-labeled ^{14}C-florasulam	At pH 5 and 7, no hydrolysis at 25°C for 30 d At pH 9, $t_{½}$ = 98–100 at 25°C and 219–226 d at 20°C	Not an important route of transformation
Phototransformation on soil	AN- and TP-labeled ^{14}C-florasulam	$t_{½}$ = 62 d	Not an important route for transformation
Biotransformation			
Biotransformation in aerobic soil	TP- and PH-labeled ^{14}C-florasulam	**Study 1** $t_{½}$ of florasulam = 0.7–4.5 d $t_{½}$ of 5-hydroxy-XDE-570 = 10–31 d	Florasulam is non-persistent. 5-Hydroxy-XDE-570 is non-persistent to moderately persistent. Important route of transformation
	TP-labeled ^{14}C-florasulam	**Study 2** Half-life of florasulam = 3.9–8.3 d Half-life of 5-hydroxy-XDE-570 = 34–56 d	Florasulam is non-persistent. 5-Hydroxy-XDE-570 is moderately persistent.
Mobility			
Adsorption and desorption in soil	PH-labeled ^{14}C-florasulam and ^{14}C-5-hydroxy-XDE-570	Adsorption K_d = 0.08–0.94 for florasulam and 0.16–0.72 for 5-hydroxy-XDE-570 Desorption K_d = 0.49–1.45 for florasulam and 0.30–0.76 for 5-hydroxy-XDE-570	High to very high mobility for florasulam and 5-hydroxy-XDE-570
Soil leaching	TP-labeled ^{14}C-florasulam	67.7–92.1% leached through the soil columns	Very high leaching potential
Field studies			
Field dissipation	EF-1343	DT_{50} for florasulam = 2–10 d DT_{90} = 16–34 d Florasulam and 5-hydroxy-XDE-570 are leachable when there is excessive rainfall or irrigation.	Florasulam is non-persistent. Carry-over is not expected. 5-Hydroxy-XDE-570 can persist and carry over.

[a] TP-labeled = triazolopyrimidine-labeled; PH-labeled = phenyl-labeled; AN-labeled = aniline-labeled

Table 5 Summary of transformation products formed in terrestrial fate studies

Study	Major transformation product (maximum concentration as % of applied)	Minor transformation products (maximum concentration as % of applied)
Hydrolysis	5-Hydroxy-XDE-570, *N*-(2,6-difluorphenyl)-8-fluoro-5-hydroxy(1,2,4)triazolo(1,5*c*)pyrimidine-2-sulphonamide (14% at 20°C and 32% at 25°C both at day 90, the end of test) A second hydrolysis product that might be formed by addition of water to triazolopyrimidine ring of parent compound (13% at 20°C and 17% at 25°C both at day 90, the end of test)	No minor transformation products detected
Phototransformation on soil	Transformation products were the same in exposed and dark control samples, indicating that they were formed by biotransformation. 5-hydroxy-XDE-570 Another transformation product, tentatively identified as amino sulfinyltriazolopyrimidine-florasulam [8-fluoro-5-methoxy(1,2,4)triazolo(1,5*c*)-pyrimidine-2-sulphonamide]	At least 5 minor transformation products detected: vinyl fluoridetriazolo-florasulam florasulam triazolo carboxylic acid triazolo-florasulam two unidentified minor transformation products
Aerobic biotransformation in soil	Study 1: 5-hydroxy-XDE-570 (72% at day 3) *N*-(2,6-difluorophenyl)-5-aminosulphonyl-1*H*-1,2,4-triazole-3-carboxylic acid (DFP-ASTCA) (18% at day 59) 5-(aminosulphonyl)-1*H*-1,2,4-triazole-3-carboxylic acid (ASTCA) (40% at day 59) 1*H*-1,2,4-triazole-3-sulphonamide (TSA) (16% at day 100)	Four minor transformation products each accounted for <5% DFP-TSA [*N*-(2,6-difluorophenyl)-1*H*-1,2,4-triazole-3-sulphonamide] (<4%) Three unidentified minor transformation products
	Study 2: 5-hydroxy-XDE-570 (50% at day 14) triazolosulfonic carboxylic acid (STCA) triazolosulfonic acid (STA) aminosulfonyltriazolo carboxylic acid (ASTCA) aminosulfonyltriazole (TSA) difluorophenyl aminosulfonyltriazolo carboxylic acid (DFP-ASTCA) difluorophenyl aminosulfonyltriazole (DFP-AST) and three other unidentifiable compounds (as a group, reached 67% at test termination)	Four unidentified minor transformation products (each <6%)
Field dissipation	5-hydroxy-XDE-570 (59% at day 28)	DFP-ASTCA (<3%)

Table 6 Fate and behaviour in the aquatic environment

Study	Test material	Value or results	Comments
Abiotic transformation			
Hydrolysis		See Table 4, Appendix III	
Phototransformation in water	AN- and TP-labeled ^{14}C-florasulam	$t_{½}$ = 88– 223 d	Not an important route of transformation
Biotransformation			
Biotransformation in aerobic water and sediment	TP- and AN-labeled ^{14}C-florasulam	$t_{½}$ of florasulam = 3 d (25°C) $t_{½}$ of 5-hydroxy-XDE-570 = 169 d (25°C)	Florasulam is non-persistent. 5-Hydroxy-XDE-570 is persistent.
Biotransformation in aerobic water and anaerobic sediment	TP- and PH-labeled ^{14}C-florasulam	$t_{½}$ of florasulam = 8.7–18 d (20°C) Half-life of 5-hydroxy-XDE-570 = 69–244 d (20°C)	Florasulam is non-persistent to slightly persistent. 5-Hydroxy-XDE-570 is moderately persistent to persistent.
Biotransformation in anaerobic water and sediment	TP- and AN-labeled ^{14}C-florasulam	In a water and soil system, $t_{½}$ of florasulam = 13 d. In a water and natural pond sediment system, $t_{½}$ < 2 d. For 5-hydroxy-XDE-570, 0.3% of applied at day 0, maximum of 87% at day 97 and 78% at day 368	Florasulam is non-persistent. 5-Hydroxy-XDE-570 is persistent
Partitioning			
Adsorption and desorption in sediment		In the above water and sediment studies, adsorption of florasulam and 5-hydroxy-XDE-570 to sediment was low.	Low partitioning into sediment

Table 7 Summary of transformation products formed in aquatic fate studies

Study	Major transformation product (maximum concentration as % of applied)	Minor transformation products (maximum concentration as % of applied)
Hydrolysis	5-Hydroxy-XDE-570, *N*-(2,6-difluorphenyl)-8-fluoro-5-hydroxy(1,2,4)triazolo (1,5*c*)pyrimidine-2-sulphonamide (14% at 20°C and 32% at 25°C both at day 90, the end of test) A second hydrolysis product that might be formed by addition of water to triazolopyrimidine ring of parent compound (13% at 20°C and 17% at 25°C both at day 90, the end of test)	No minor transformation products detected
Phototransformation in water	TPSA of florasulam (17% at test termination)	Several unidentified minor transformation products (<6% as a group at test termination)
Biotransformation in aerobic water and sediment	5-Hydroxy-XDE-570 (80% at day 10) DFP-ASTCA (26% at 91) A compound tentatively identified as STCA (31% at day 91)	A compound unidentified minor transformation product (<9%)
Biotransformation in aerobic water and anaerobic sediment	5-Hydroxy-XDE-570 (99% at day 60) DFP-ASTCA (39% at test termination) An unstable intermediate transformation product occurs between the 5-hydroxy-XDE-570 and DFP-ASTCA and is readily broken down to DFP-ASTCA (14.2% at day 100).	A compound unidentified minor transformation product (<6%)
Biotransformation in anaerobic water and sediment	5-Hydroxy-XDE-570 (87% at day 97)	One tentatively identified as *N*-(2,6-difluorophenyl)-5-amino-sulphonyl-1-methyl-1,2,4-triazole-3-carboxylic acid (7.8% at test termination)

Table 8 Effects on terrestrial organisms

Organism	Exposure	Test substance	End point value	Degree of toxicity
Invertebrates				
Earthworm	Acute	Florasulam	14-d LC_{50} > 1300 mg a.i./kg soil 14-d NOEC = 1300 mg a.i./kg soil	N.A.
		5-hydroxy-XDE-570	14-d LC_{50} > 1120 mg a.i./kg soil 14-d NOEC = 1120 mg a.i./kg soil	N.A.
		DFP-ASTCA, ASTCA and TSA	14-d LC_{50} > 100 μg a.i./kg soil 14-d NOEC = 10 μg a.i./kg soil	N.A.
		STA and STCA	14-d LC_{50} > 100 μg a.i./kg soil 14-d NOEC = 100 μg a.i./kg soil	N.A.
Bee	Oral	Florasulam	48-h LC_{50} > 100 μg a.i./bee	Relatively[a] non-toxic
	Contact	Florasulam	48-h LD_{50} > 100 μg a.i./bee, 48-h NOEC = 100 μg a.i./bee	Relatively[a] non-toxic
Birds				
Japanese quail	Acute oral	Florasulam	14-d LD_{50} = 1047 mg a.i./kg bw 14-d NOEL = 175 mg a.i./kg bw	Slightly toxic
	Dietary	Florasulam	8-d LC_{50} > 5000 mg a.i./kg diet 8-d NOEC = 5000 mg a.i./kg diet	Practically non-toxic
Bobwhite quail	Reproduction	Florasulam	NOEC = 1500 mg a.i./kg diet LC_{50} > 1500 mg a.i./kg diet	N.A.
Mallard duck	Dietary	Florasulam	8-d LD_{50} > 5000 mg a.i./kg diet 8-d NOEC = 5000 mg a.i./kg diet	Practically non-toxic
	Reproduction	Florasulam	NOEC = 1500 mg a.i./kg diet LC_{50} > 1500 mg a.i./kg diet	N.A.
Mammals				
Rat	Acute oral	Florasulam	LD_{50} > 6000 mg a.i./kg bw	Practically non-toxic
	90-d Dietary	Florasulam	NOAEL = 100 mg a.i./kg bw/d	N.A.
	2-generation Reproduction	Florasulam	Parental and offspring NOAEL = 100 mg a.i./kg bw/d Reproductive NOAEL = 500 mg a.i./kg bw/d	N.A.
	Acute inhalation	Florasulam	LC_{50} > 5 mg/L	Low toxicity
Mouse	Acute oral	Florasulam	LD_{50} > 5000 mg a.i./kg bw	Practically non-toxic
	90-d dietary	Florasulam	NOAEL = 100 mg a.i./kg bw/d	N.A.

Organism	Exposure	Test substance	End point value	Degree of toxicity
Rabbit	Acute dermal	Florasulam	LD_{50} > 200 mg a.i./kg bw	Low toxicity
Vascular plants				
Vascular plant	Seedling emergence	EF-1343	EC_{25} = 4.3 g a.i./ha visual rating on radish. For all other species, the EC_{25} and EC_{50} values were all >10 g a.i./ha.	N.A.
	Vegetative vigour	EF-1343	Least activity on the monocot species. EC_{25} values for tomato, carrot, radish, sunflower, cucumber and soybean were 0.02, 0.09, 0.07, 0.04, 0.35 and 0.2 g a.i./ha, respectively.	N.A.

[a] Atkins et al. (1981) for bees and EPA classification for others, where applicable

Table 9 Effects on aquatic organisms

Organism	Exposure	Test substance	End point value	Degree of toxicity[a]
Freshwater species				
Daphnia magna	Acute	Florasulam	48-h LC_{50} or EC_{50} > 292 mg a.i./L 48-h NOEC = 174 mg a.i./L	Practically non-toxic
		EF-1343	48-h EC_{50} > 100 mg EF-1343/L (5.5 mg a.i./L) 48-h NOEC = 100 mg EF-1343/L (5.5 mg a.i./L)	Practically non-toxic
		5-hydroxy-XDE-570	48-h LC_{50} or EC_{50} > 96.7 mg a.i./L 48-h NOEC = 96.7 mg a.i./L	Practically non-toxic
	Chronic	Florasulam	21-d LC_{50} = 169.2 mg a.i./L 21-d NOEC = 38.9 mg a.i./L	N.A.
Rainbow trout	Acute	Florasulam	96-h LC_{50} > 100 mg a.i./L 96-h NOEC = 100 mg a.i./L	Practically non-toxic
		EF-1343	96-h LC_{50} > 100 mg EF-1343/L (5.7 mg a.i./L) 96-h NOEC = 100 mg EF-1343/L (5.7 mg a.i./L)	Practically non-toxic
		5-hydroxy-XDE-570	96-h LC_{50} > 100 mg a.i./L 96-h NOEC = 100 mg a.i./L	Practically non-toxic
	Chronic	Florasulam	28-d LC_{50} > 119 mg a.i./L 28-d NOEC = 119 mg a.i./L.	Practically non-toxic
Bluegill sunfish	Acute	Florasulam	96-h LC_{50} > 100 mg a.i./L 96-h NOEC = 100 mg a.i./L	Practically non-toxic
Freshwater alga	Acute	Florasulam	diatom cell count 5-d EC_{25} = 0.18 mg a.i./L 5-d EC_{50} = 0.97 mg a.i./L 5-d NOEC = 0.049 mg a.i./L	N.A.
		EF-1343	green algae biomass 72-h EC_{50} = 3.45 μg a.i./L 72-h NOEC = 1.75 μg a.i./L	N.A.
		5-hydroxy-XDE-570	green algae cell count 96-h EC_{25} = 11.59 mg a.i./L 96-h EC_{50} = 25.57 mg a.i./L 96-h NOEC = 6.64 mg a.i./L.	N.A.
Vascular plant	Dissolved	Florasulam	duckweed frond number 14-d EC_{25} = 0.57 μg a.i./L 14-d EC_{50} = 1.18 μg a.i./L 14-d NOEC = 0.62 μg a.i./L	N.A.

Organism	Exposure	Test substance	End point value	Degree of toxicity[a]
Marine species				
Crustacean	Acute	Florasulam	grass shrimp 96-h LC_{50} > 130 mg a.i./L 96-h NOEC = 130 mg a.i./L	Practically non-toxic
Mollusk	Acute	Florasulam	oyster shell deposition 96-h LC_{50} > 125 mg a.i./L 96-h NOEC = 125 mg a.i./L	Practically non-toxic
Fish	Acute	Florasulam	silverside 96-h LC_{50} > 122 mg a.i./L 96-h NOEC = 122 mg a.i./L	Practically non-toxic
Marine alga	Acute	Florasulam	marine diatom 5-d EC_{25} = 32.4 mg a.i./L 5-d EC_{50} = 47.6 mg a.i./L 5-d NOEC = 22.8 mg a.i./L	N.A.

[a] EPA classification, where applicable

Table 10 Risk to terrestrial organisms

Organism	Exposure	End point value	EEC	MOS	Risk
Invertebrates					
Earthworm	Acute	14-d NOEC = 1300 mg a.i./kg soil	0.0022 mg a.i./kg soil	5.9×10^5	No risk
Bee	Contact	NOEC 112 kg a.i./ha	5 g a.i./ha	2.2×10^4	No risk
Birds					
Japanese quail	Acute oral	14-d NOEC = 175 mg a.i./kg bw	0.6 mg a.i./kg dw diet	1.2 × 103 d	No risk
	Dietary	8-d NOEC = 5000 mg a.i./kg diet	0.6 mg a.i./kg dw diet	8.3×10^3	No risk
Bobwhite quail	Reproduction	NOEC = 1500 mg a.i./kg diet	0.6 mg a.i./kg dw diet	2.5×10^3	No risk
Mammals					
Mouse	Acute	LD_{50} > 5000 mg a.i./kg bw	2.51 mg a.i./kg dw diet	$>9.2 \times 10^3$ d	No risk
Rat	Dietary	NOAEL = 100 mg a.i./kg bw/d (1621 mg a.i./kg dw diet)	2.52 mg a.i./kg dw diet	6.4×10^2	No risk
	Reproduction	NOAEL = 100 mg a.i./kg bw/d = 1621 mg a.i./kg dw diet	2.52 mg a.i./kg dw diet	6.4×10^2	No risk
Vascular plants					
Vascular plant	Seedling emergence	EC_{25} = 4.3 g a.i./ha	5 g a.i./ha	8.6×10^{-1}	Moderate risk
	Vegetative vigour	EC_{25} = 0.02 g a.i./ha	5 g a.i./ha	4×10^{-3}	Very high risk

Table 11 Risk to aquatic organisms

Organism	Exposure	End point value	EEC	MOS	Risk
Freshwater species					
Daphnia magna	Acute	48-h NOEC = 174 mg a.i./L	0.001667 mg a.i./L	1.04×10^5	No risk
	Chronic	21-d NOEC = 38.9 mg a.i./L	0.001667 mg a.i./L	2.33×10^4	No risk
Rainbow trout	Acute	96-h NOEC = 100 mg a.i./L	0.001667 mg a.i./L	6.00×10^4	No risk
	Chronic	28-d NOEC = 119 mg a.i./L	0.001667 mg a.i./L	7.14×10^4	No risk
Bluegill sunfish	Acute	96-h NOEC = 100 mg a.i./L	0.001667 mg a.i./L	6.00×10^4	No risk
Freshwater alga	Acute	72-h NOEC = 1.75 μg a.i./L	0.001667 mg a.i./L	1.05×10^0	Low risk
Vascular plant	Dissolved	14-d NOEC = 0.62 μg a.i./L	0.001667 mg a.i./L	3.7×10^{-1}	Moderate risk
Marine species					
Crustacean	Acute	96-h NOEC = 130 mg a.i./L	0.001667 mg a.i./L	7.8×10^4	No risk
Mollusk	Acute	96-h NOEC = 125 mg a.i./L	0.001667 mg a.i./L	7.50×10^4	No risk
Fish	Acute	96-h NOEC = 122 mg a.i./L	0.001667 mg a.i./L	7.32×10^4	No risk
Marine alga	Acute	5-d NOEC = 22.8 mg a.i./L	0.001667 mg a.i./L	1.37×10^4	No risk

Appendix IV Value

Table 1 Proposed herbicide tankmixes with EF-1343 Suspension Concentrate Herbicide, plus surfactant in spring wheat, durum wheat, spring barley and oats

Annual grass herbicide tankmix	PCP Act registration no.	Broadleaf herbicide application rate	
		Product (L/ha)	Active ingredient (g a.i./ha)
MCPA ester (500 g/L)	Several	0.84	420
Curtail M Herbicide	22764	1.5	495
Assert 300 SC Herbicide	21032	1.6	500
Horizon 240 EC Herbicide	24067	0.23–0.29	56–70
Puma Super Herbicide	25511	1	92

Table 2 Proposed non-ionic surfactant tankmix with EF-1343 Suspension Concentrate Herbicide and tankmix partners

Product name	PCP Act registration no.	Recommended application rate
Agral 90	11809 or 24725	0.2% v/v
Score	12200	0.8–1.0% v/v

Table 3 Alternative post-emergent herbicides for broadleaf weed control in cereals

Technical grade active ingredient	End-use products	Herbicide classification	
		Group	Mode of action
Metsulfuron methyl	Ally Herbicide	2	ALS inhibitor
Imazamethabenz	Assert Herbicide	2	ALS inhibitor
Fluroxypyr	Starane (Attain concept)	4	Synthetic auxin
Dicamba	Banvel Herbicide	4	Synthetic auxin
Basagran	Bentazon Herbicide	6	Inhibitor of photosystem II Site A
Bromoxynil	Pardner Herbicide	6	Inhibitor of photosystem II Site A
Thifensulfuron methyl	Refine Herbicide	2	ALS inhibitor
Tribenuron methyl	Express Toss n' go	2	ALS inhibitor
Clopyralid	Lontrel Herbicide	4	Synthetic auxin
Linuron	Linuron 400 L	7	Inhibitor of photosystem II Site B
Mecoprop	Mecoprop amine 400	4	Synthetic auxin
MCPA	several	4	Synthetic auxin
2,4-D	several	4	Synthetic auxin
Triasulfuron methyl	Unity 75 WG (Unity concept)	2	ALS inhibitor

Table 4 Summary of label proposals and recommendations based on value review

Proposed		Recommendation (based on value assessment)	Comments
Application timing	Cereals from the 2-leaf growth stage up to and including the flag leaf extended stage	Cereals from the 2- to 6-leaf stage	Majority of crop tolerance trials were conducted at the 2- to 6-leaf stage of cereals.
No. of applications	1 per year	same	
Application method	Ground application only DO NOT APPLY BY AIR. Do not apply through any type of irrigation system.	same	
Crops	Spring wheat	Yes	Adequate crop tolerance demonstrated with EF-1343 applied alone or in tank mixtures
	Durum wheat	Yes	Adequate crop tolerance demonstrated with EF-1343 applied alone or in tank mixtures
	Spring barley	Yes	Adequate crop tolerance demonstrated with EF-1343 applied alone or in tank mixtures
	Oats (tankmix only)	Yes	Adequate crop tolerance demonstrated with EF-1343 applied in tank mixtures
Weeds	Control of: volunteer canola (including Roundup Ready and Liberty Link), common chickweed, cleavers, shepherd's purse, smartweed, stinkweed, wild buckwheat, wild mustard	Yes	Adequate efficacy demonstrated with EF-1343 alone on requested weed species
	Suppression of: hempnettle, redroot pigweed, annual sowthistle, perennial sowthistle	Yes	Same with label statement for perennial sowthistle indicating that applications made at advanced leaf stages will reduce product effectiveness
Spray volume	50–100 L/ha	minimum of 100 L/ha	No data submitted for 50 L/ha for EF-1343 applied alone. Limited data submitted for MCPA ester tankmix and Curtail tankmix, which was not summarized in a manner to facilitate review

Proposed		Recommendation (based on value assessment)	Comments
Herbicide tankmixes			
MCPA ester	Control of: volunteer canola (including Roundup Ready, Liberty Link, Smart), common chickweed, cleavers, dandelion (seedlings), flixweed, hempnettle, lamb's quarters, ball mustard, wild mustard, redroot pigweed, common ragweed, shepherd's purse, smartweed, stinkweed, stork's bill, wild buckwheat	Remove flixweed, move dandelion (seedlings) to suppression, move stork's bill to suppression	Sufficient data to demonstrate efficacy for the tankmix with slight changes to the label: insufficient data for flixweed, dandelion seedlings suppression, stork's bill suppression
	Suppression of: Canada thistle (top growth only), dandelion (overwintered rosettes <15 cm), round-leaved mallow, annual sowthistle, perennial sowthistle (top growth control)	Remove round-leaved mallow	Insufficient data for round-leaved mallow
Curtail M	Control of: Canada thistle, volunteer canola (including Roundup Ready, Liberty Link, Smart), common chickweed, cleavers, dandelion (seedling, overwintered rosettes <15 cm), hempnettle, lamb's quarters, ball mustard, redroot pigweed, shepherd's purse, smartweed, annual sowthistle, perennial sowthistle, stinkweed, stork's bill, wild buckwheat, flixweed	Remove ball mustard, move perennial sowthistle to suppression, move dandelion to suppression, indicate flixweed (spring rosettes only)	Insufficient data for ball mustard, suppression for dandelion and perennial sowthistle, flixweed (spring rosettes only) per wording on the Curtail M label
	Suppression of: dandelion (overwintered rosettes >15 cm; mature plants), round-leaved mallow	Remove round-leaved mallow. Accept dandelion (seedlings and overwintered rosettes)	Insufficient data for round-leaved mallow Data for dandelion suggest wording as: seedlings and overwintered rosettes.